

**JACOBS**

# TES IV



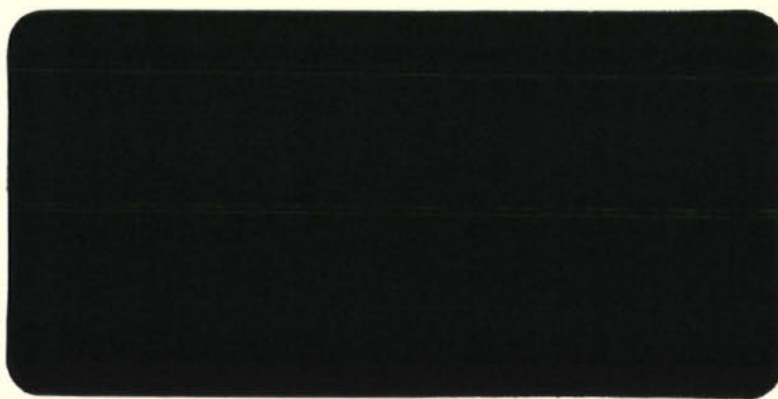
**JACOBS ENGINEERING GROUP INC.  
ENVIRONMENTAL SYSTEMS DIVISION**

IN ASSOCIATION WITH:  
TETRA TECH  
METCALF & EDDY  
ICAIR LIFE SYSTEMS  
KELLOGG CORPORATION  
GEO/RESOURCE CONSULTANTS  
BATTELLE PACIFIC NORTHWEST LABORATORIES  
DEVELOPMENT PLANNING AND RESEARCH ASSOCIATES

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TES IV - J10-0439, NI-0001

ENVIRONMENTAL PROTECTION AGENCY  
TECHNICAL ENFORCEMENT SUPPORT AT  
HAZARDOUS WASTE SITES

TES IV  
CONTRACT #68-01-7351  
WORK ASSIGNMENT #439  
RESPONSIBLE PARTY SEARCH FOR  
COLBERT LANDFILL  
SPOKANE, WASHINGTON

JACOBS ENGINEERING GROUP, INC.  
PROJECT NUMBER 05-B43900

OCTOBER 1987

*attached letter*

*TEST- J10-0439-N1-0001*



**JACOBS ENGINEERING GROUP INC.**  
**ENVIRONMENTAL SYSTEMS DIVISION**

1111 THIRD AVENUE - SUITE 700 • SEATTLE, WA 98101 • (206) 622-0907

October 21, 1987

Mr. Neal Thompson  
U.S. Environmental Protection Agency  
1200 Sixth Avenue  
Seattle, WA 98101

Re: Prime Contract No. 68-01-7351  
Project No. 05-B439-00  
Bunker Hill  
CERCLA  
Region X

Dear Mr. Thompson:

In compliance with the requirements of Activity 4 of the work plan for the subject project, we are providing a copy of the draft Responsible Party Search Report for Bunker Hill for your review and comment. We would appreciate your comments within two to three weeks so that the final report can be prepared prior to November 16, 1987.

Sincerely,

*for* *1 JD1*  
Lloyd Reed  
Region X Manager

LR/tb

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## SECTION 1 SUMMARY

Colbert Landfill is a 40-acre sanitary landfill located about 15 miles north of Spokane, Washington. The site has been owned and operated by Spokane County since it was opened in 1968. In 1980, groundwater in the area was found to be contaminated, primarily with 1,1,1 trichloroethane.

EPA, Region X, has identified two potentially responsible parties with respect to the site: Key Tronic Corporation, which disposed of spent solvents at Colbert Landfill at a rate of several hundred gallons per month, and Spokane County, owner of the site.

The purpose of the technical support provided on this work assignment is to determine if there are additional potentially responsible parties which may have contributed to the groundwater pollution at the site. Using information obtained from Key Tronic Corporation and state and county agencies, ten parties have been identified as potentially responsible parties.



## SECTION 2 INTRODUCTION

### 2.1 PROJECT BACKGROUND

The Colbert Landfill is located approximately 15 miles north of Spokane, Spokane County, Washington (see Figure 2-1). The sanitary landfill is approximately 40 acres in size and has been owned and operated by Spokane County since the beginning of its operations in 1968. Key Tronic Corporation, a local electronic firm disposed spent solvents into the landfill, at a rate of several hundred gallons per month, from 1975 to 1980. The spent solvent was composed of a mixture of 1,1,1 trichloroethane (TCA) and methylene chloride. The mixture was dumped into the exposed trenches and allowed to mix with the soils and refuse already in the trenches.

In 1980, the disposal practices of the Key Tronic Corporation were identified and stopped. At that time several domestic wells adjacent to the landfill were sampled. The chemical, 1,1,1 trichloroethane, was identified in several of the wells, with concentrations as high as 24,000 ppb. This level was above the Suggested No Adverse Response Level (SNARL) and the Washington Department of Ecology recommended against consumptive uses. The Environmental Protection Agency (EPA) Region X has initiated a Potentially Responsible Party (PRP) search for the Colbert Landfill site. Jacobs Engineering Group has provided assistance in this activity and, as defined in the work plan proposed to perform the following tasks:

- Conduct a preliminary information review to define objectives and data collection activities.
- Review EPA, state and local government files.
- Identify and interview individuals who are knowledgeable regarding the Colbert Landfill site.
- Submit appropriate information and documentation relevant to all tasks.

The Jacobs Work Assignment Manager consulted with the EPA Primary Contact, Neil Thompson, throughout the project for specific directions in regard to the task objectives.

### 2.2 PROJECT APPROACH

Jacobs personnel conducted a preliminary review to specifically define the tasks and focus required data collection activities. Mr. Thompson provided verbal assistance and allowed access to EPA regional files. Pertinent records of the Eastern Regional Office of the Washington Department of Ecology (WDOE), Spokane County Health District, Department of Public Works, and Washington Department of Ecology (Olympia office, Headquarters) were also reviewed. In addition, Key Tronic Corporation's files were searched in an effort to obtain information which would prove useful in determining additional PRPs.



Information gathered during the PRP search has been compiled and summarized in Sections 3 and 4. Conclusions and recommendations are presented in Sections 5 and 6. References are listed in Appendix A.

All information and documents compiled in each task are serially identified and copies maintained in Jacobs files. Copies of all information supporting this report are attached herein as Appendix C.

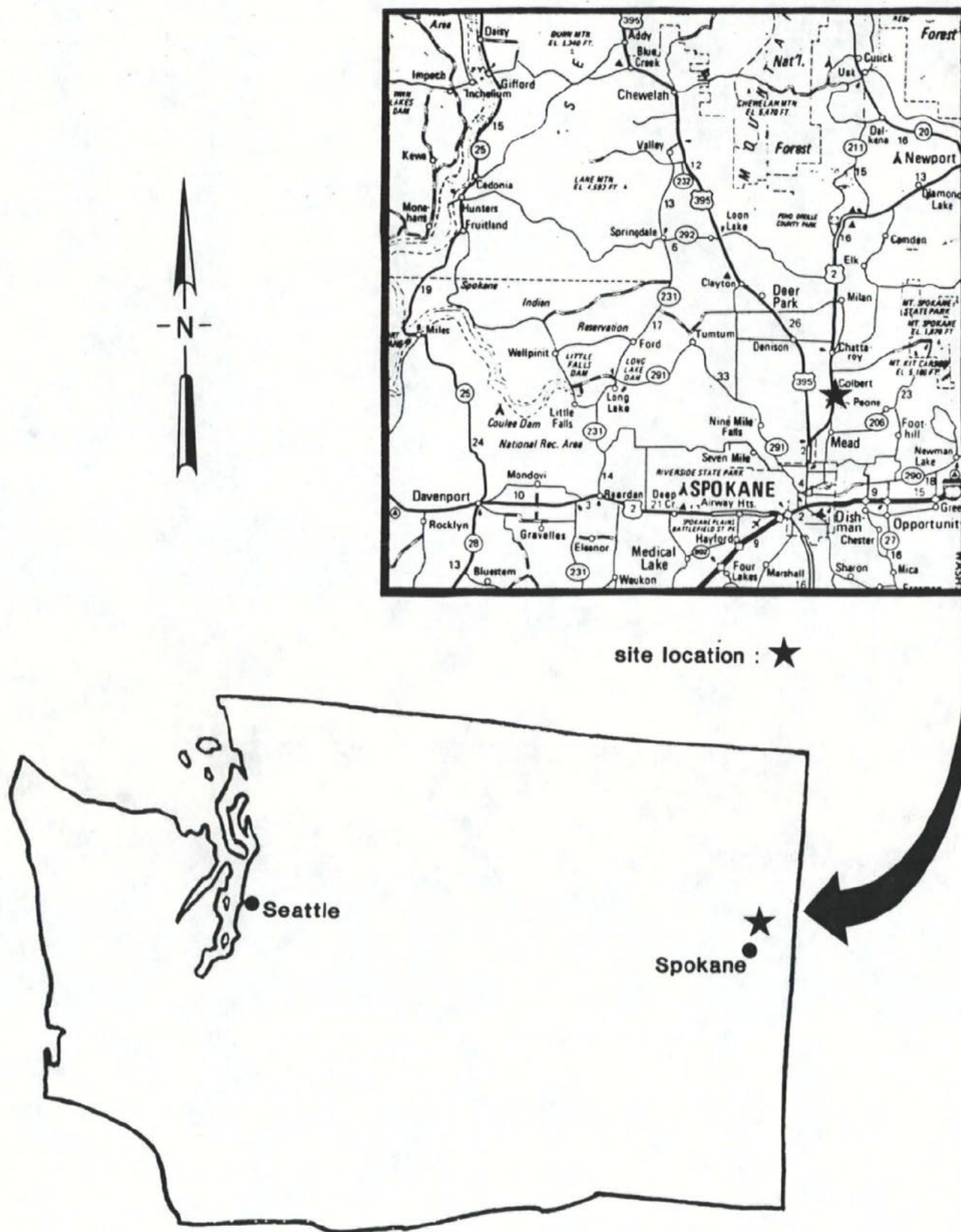


Figure 2-1 : Colbert Landfill – Location Map.



## SECTION 3 PRELIMINARY INVESTIGATION

### 3.1 SITE HISTORY

A preliminary investigation was conducted to determine the current status of the Colbert Landfill site and identify the requirements for collection of data. Mr. Neil Thompson, EPA Region X, provided a verbal summary of operational and regulatory history of the Colbert Landfill. Additional information was obtained from EPA regional files made available by Mr. Thompson. A review of those documents and records obtained from the Eastern Regional Office of the Washington Department of Ecology, Spokane County Health District, Department of Public Works, Washington State Department of Ecology (Olympia office, Headquarters) and Key Tronic Corporation provided important historical information. From these sources a partial description of the Colbert Landfill operations and history was compiled.

The Colbert Landfill site is located approximately 15 miles north of Spokane city limits, 3 miles south of Chattaroy, and 1 mile east of U.S. Highway 195 in the County of Spokane, Washington (see Figure 3-1). The landfill is situated on a lift of glacial till above the Little Spokane aquifer. The soil around the area is porous and made up of washed glacial till. The surface drainage is to the southwest and eventually flows into the Little Spokane River. Ground water movement follows the surface water flow. [1]

The site has been in operation since 1968 as a sanitary landfill. The landfill is owned by Spokane County and is operated under the supervision of the Spokane County Utilities Department. When the landfill was opened in 1968, it replaced the old Colbert township dump, which is located adjacent to the site on the south side. [2]

Colbert Landfill operations include the use of a scraper and dozer to excavate disposal pits approximately 30 feet wide and reaching depths of 20 to 30 feet below the land surface. Each new pit is excavated so that the west boundary nearly intersects the waste previously disposed of in the adjacent filled pit. [3]. As wastes are deposited into the trench, they are compacted at least four times and are covered daily with six inches of soil. A final cover of two feet of soil is then placed over the trench when it is full. [2] Operations of the site are under contract to an independent contractor.

In October 1980, the WDOE received a call from a resident concerning industrial dumping at the landfill. [1]. Further investigation revealed that the Key Tronic Corporation was disposing spent solvents at the landfill.

The spent solvent was composed of a mixture of 50% 1,1,1 trichloroethane (TCA) and 50% methylene chloride. Key Tronic personnel reported that the company had been using the landfill from 1975 to 1980 and was dumping between 200 to 400 gallons of the solvent mixture each month. [2]

Key Tronic personnel transported the waste solvents to the landfill in drums. The drums were opened on the site and the contents were poured into the trench so that the waste solvents could be absorbed by the soil and trash before being covered. Reportedly the waste solvents were disposed of throughout the landfill sections that were active between 1975 and 1980. Consequently the disposal location and source of the contamination is not localized in any one place within the landfill. [2]



In April 1981, Spokane County contracted George Maddox and Associates to complete a three-phase study of the hydrology of the landfill site. During Phase I, a short term ground water quality monitoring program was implemented along with a historical review and data acquisition of the site. Phase II expanded the ground water quality sampling and analysis with drilling and construction of monitoring wells. This phase was completed in June 1982. Phase III was conducted to monitor a complete hydrologic cycle of the area and was completed in January 1984. [4]

CH<sub>2</sub>M Hill was also contracted to prepare a Remedial Master Plan (RAMP) and Remedial Action design for the Colbert Landfill area. CH<sub>2</sub>M Hill used data which was available from studies completed prior to June 1983. The completed report was released to the EPA on August 8, 1983.

The following is a chronology of events concerning the Colbert Landfill since October 1980:

October 1980	Washington DOE received a citizen complaint concerning hazardous waste being disposed of in the Colbert Landfill. Key Tronic Corporation was identified as the primary source of the contaminant.
April 1981	Spokane County contracted George Maddox and Associates to conduct a three-phase study of the hydrology of the Colbert Landfill site.
January 1982	EPA discussed the approach of doing the Remedial Investigation and Feasibility Study (RI/FS) with Spokane County and Key Tronic representatives.
December 1982	The proposed National Priorities List (NPL) included the Colbert Landfill.
June 1983	CH <sub>2</sub> M Hill was contracted by Spokane County to prepare a RAMP and Remedial Action design for the Colbert Landfill area.
October 1983	Colbert Landfill was listed as NPL site.
March 1984	WDOE began RI plan. Spokane County and Key Tronic Corporation agreed to provide continued domestic well monitoring.
July 1986	RI draft report was released to EPA.
May 1987	Draft FS was released to EPA.
June 1987	End of FS comment period.



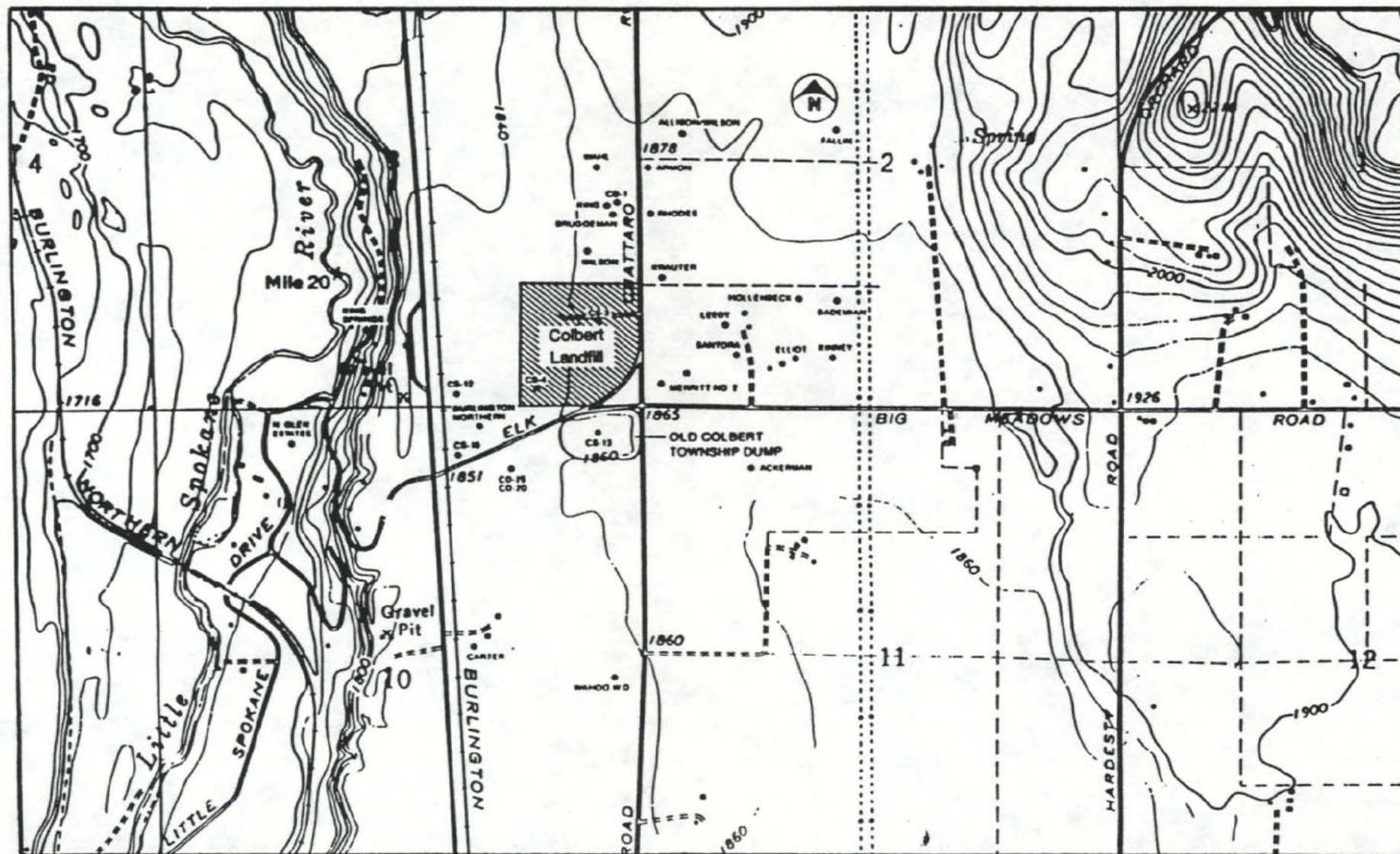


Figure 3-1 : Colbert Landfill - Area Map.



During the Remedial Investigation (1986) six volatile organic chemicals were detected in the groundwater at the Colbert Landfill and are referred to in this report as the "contaminants of concern":

1,1,1 trichloroethane  
1,1,- dichloroethylene  
1,1 - dichloroethane  
Trichloroethylene  
Tetrachloroethylene  
Methylene Chloride

Since the primary ground water contaminant is 1,1,1 trichloroethane, Key Tronic\* is believed to be a responsible party, along with Spokane County, the owner/operator of the landfill. Key Tronic and Spokane County have undertaken an investigation to identify other parties responsible for the contamination at Colbert Landfill and have produced a list of possibly liable individuals and businesses, which include the following: Fairchild Air Force Base\*, A & M Manufacturing, Alumax Irrigation Products, William Schmidt, United Paint & Coatings, Gene's Septic Service, Scollard's Dry Cleaning, Husky Oil, Williams Trucking, Van Water and Rogers, Travis Pattern and Foundry, Columbia Lighting, Great Western Chemicals, Washington Chemical and Union Pacific Railroad.

### 3.2 INFORMATION SOURCES

Jacobs contacted the offices listed below and spoke with the persons identified regarding information and available records on Colbert Landfill. Each person contacted was advised that Jacobs was under contract to the U.S. EPA Region X to conduct such research regarding the site and that all information received would ultimately be transmitted to U.S. EPA.

#### Key Tronic Corporation

Contact: David Powers, General Counsel, Key Tronic  
509/928-800

Jacobs personnel met with the following individuals to discuss the status of the search for other responsible parties by Key Tronic and Spokane County:

David Powers, General Counsel, Key Tronic; Bruce Foreman, Vice President, Printed Circuit Division, Key Tronic; Jerry Neal, Lukins & Annis, attorney representing Spokane County; Robert Bailor, Private Investigator hired by Key Tronic.

Jacobs personnel were given a brief overview of the ongoing investigation by Key Tronic and given access to the company's files. Photocopies were made of relevant documents. These documents are incorporated into Appendix C, and an interview summary is located in Appendix B.

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\*Table 3-1 depicts the quantities of spent solvents disposed of in the landfill by Key Tronic Corporation and Fairchild Air Force Base from 1975 to 1980.



**Table 3-1**  
**REPORTED HAZARDOUS MATERIALS**  
**DISPOSED OF AT THE COLBERT LANDFILL**

<u>Source</u>	<u>Compound</u>	<u>Quantity (gal/month)</u>
Key Tronic <sup>a</sup> Corporation	Methylene chloride (20-25% acrylic resins by weight)	400
	1,1,1-trichloroethane (20-25% acrylic resins by weight)	150-200
	Mixture of Above (10% acrylic resins by weight)	100-150
Fairchild Air Force Base	Methyl Ethyl Ketone	25
	Poly Thinner	12.5
	Enamel Thinner	10
	Toluene	10
	Paint Remover	10
	Primer Wastes	10

<sup>a</sup> Total quantities listed do not agree with quantities reported disposed of by Key Tronic.

Source: Letter from Spokane Utilities to the Spokane County Health District dated June 4, 1980, regarding hazardous waste survey of materials disposed of at the Colbert and Mica Landfills. [22]

Spokane County Public Works

Contact: Dennis Scott, Director, Spokane  
Public Works 509/456-3600

Dennis Scott provided access to his personal files on Colbert Landfill as well as the files and records maintained by the Utilities Department. The records kept at the landfill from 1968 through 1980 were of little help in identifying what parties disposed of what wastes during that period. Most transactions were on a cash only basis, with tickets issued rather than individual receipts.

Mr. Scott identified Jim Legat with the Utilities Department as the individual with the most knowledge of past activities at Colbert Landfill. Mr. Legat has worked in the Department since 1969 and has been responsible for the Spokane County landfills. He provided information regarding the operations and management practices at Colbert.

The interviews are summarized in Appendix B, and the copies of the documents collected from the agency are included in Appendix C.

Spokane County Health District

Contact: Rhys Sterling, Solid Waste Program Coordinator  
509/456-6040

Rhys Sterling was contacted for information and records maintained by the Health District regarding the site. Relevant documents were photocopied and are included in Appendix C.

Washington State Department of Ecology

Contact: Claude Sappington,  
Eastern Regional Office, Spokane, Washington  
509/456-6149

Claude Sappington provided access to the Regional Office's files on Colbert Landfill. These files did not provide any new information relevant to the PRP search.

Contact: Mike Blum, Hazardous Waste Section, Program Manager  
Headquarters, Olympia, Washington  
206/438-3043

Mike Blum provided access to his files for Colbert Landfill. These files did not provide any new information relevant to the PRP search.

Spokane County Commissioner

Contact: Commissioner John McBride, District #1  
509/456-2265

Commissioner John McBride is working with Spokane County agencies and Key Tronic on the clean-up measures and related activities at Colbert Landfill. He was contacted for



any information he has regarding other potentially responsible parties. Mr. McBride suggested that the railroad companies be investigated as potentially responsible parties. He stated that he did not have any information or documentation other than that available from individuals and agencies previously contacted by Jacobs personnel.

The local fire and police records were not reviewed, as the information was not expected to be relevant. This variation from the work plan was made with the approval of the U.S. EPA Region X primary contact, Neil Thompson.

Jacobs personnel began with the list provided by Key Tronic of other parties that may be responsible for the contamination at Colbert Landfill. The information and documents collected during the preliminary investigation were organized and reviewed in order to answer the following question for each party:

- 1) Is there documentation indicating that contaminants of concern were used, purchased, supplied or transported by the party?
- 2) Is there documentation indicating that the party used Colbert Landfill as a disposal site (waste unspecified)?
- 3) Is there documentation indicating the party disposed of, or was responsible for the disposal of, contaminants of concern at Colbert Landfill?

**SECTION 4**  
**POTENTIALLY RESPONSIBLE PARTIES**

**I. FAIRCHILD AIR FORCE BASE, U.S. AIR FORCE**

Fairchild Air Force Base can be classified as a generator of hazardous wastes and may fall under the scope of CERCLA Section 107(a)(3). The information collected suggests that Fairchild Air Force Base purchased, used and disposed of trichloroethylene, trichloroethane, and tetrachloroethylene.

**Address/Contact:**

Colonel Richard A. Wolf  
92nd Combat Support Group  
CC Commander  
Fairchild AFB, WA 99011-5000

Captain Brad Peck  
(PIO) 92 BMV PA/PA  
Fairchild AFB, WA 99011-5000  
telephone: 509-247-5704

Captain William Courtney  
(Environmental Officer)  
Fairchild Hospital  
Fairchild AFB, WA 99011-5000  
telephone: 509-247-5267

**1. Basis for Inclusion**

- A. Documentation that Fairchild AFB purchased and used contaminants of concern includes the following:
  - 1. List of chemicals used and disposal methods from 92nd WPNS Maintenance & Storage Branch, FAFB, dated 14 June 1973. Includes listing for "Trichlor". [12]
  - 2. Hazardous Waste Generation and Disposal, Fairchild Air Force Base, Spokane, Washington. 9 June 1975. The list is organized by shop and lists materials each shop used and how they disposed of the waste. The Field Maintenance Squadron listed trichloroethylene and trichloroethane, both "disposed of" by evaporation. Other wastes include an aircraft cleaning compound and solvent. [13]
  - 3. Memo to USAFH/SGPM from FFA, Capt. Larson, 2039 Communications Squadron, dated 26 January 1978, re: Chemical Inventory Listing. The list of chemicals used includes "trichloroethylene", "disposed of" through evaporation. [15]
  - 4. Handwritten chart (no date) showing Agent/Process, Code Type, Quantity, Waste Disposal Method.



Includes: AMS - Trichloroethylene 6810-00-812-9181 used in vapor degreasing, F001, 200 lbs/mo., stored in 55-gallon drums and taken to county approved sanitary landfill;

National Guard - Pneudralics: trichloethylene/degreaser, F005, 120 lbs/mo., dry well disposal;

FMS [gelM and Accessory Repair Shop] Trichoroethylene, MIL-T-26702, used to clean bearings, D001, 74 lb/mo., taken to county approved sanitary landfill. [20]

5. 92D Field Maintenance Squadron -  
Egress Shop: Annual chemical products list.  
Includes trichloroethane, 1 gal/yr. No waste - all materials consumed during work. Dated 30 January 1980. [21]
6. Memo to Base Environmental Coordinator from LGSP, WA Air Nat'l Guard, Fairchild AFB, dated 25 June 1980, re: Health Hazard Items. The inventory list includes "trichloethy" and "trichloet OT 620." [24]
7. EPA Hazardous Waste Permit Application, form 3510-3, no date, but attached to letter dated 18 November 1980. Under description of hazardous waste: TCE, V229, 1000 p/yr. [28]
8. Memo to 92 CES/DEEVE (Jespersion) from MAAMD (TSgt. Saul), 920 Avionics Maintenance Squadron, dated 23 June 1980, re: Hazardous Waste Management. The memo states: "The only disposal system employed is to truck the contaminated trichloroethylene and cleaning solvent to the Spokane county landfill."  
  
The attached list of hazardous chemicals available for use within the squadron includes: Trichloroethylene, storage 165 gal/6M; Portion evaporates during use - remainder is trucked to Spokane landfill. [23]
9. Shipping form dated 9/1/81 from FX 4620 92 CSG/AMS/244AR Fairchild AFB to S2D380 DPDO OSB Spokane, Fairchild AFB, item nomenclature: Trichloroethylene, contaminated with 5% Borecleaner and gun oil. [29]
10. Letter to Colonel B. S. Schneider, Jr., Base Commander, Fairchild AFB from James Malm, WDOE, dated October 17, 1983, re: Hazardous Waste Compliance inspection on September 28, 1983. On page 2 of the letter, it is stated: "... The base had generated the following wastes at the time of the inspection:
  - a. Methyl Ethyl Ketone - 700 gallons/year;
  - b. 1,1,1 Trichloroethane - 110 gallons/year;
  - c. One 30-gallon drum of super tropical bleach ... ." [31]
11. Memo for the Record. Major Users of Industrial Solvents dated (?) October 1979. List includes:

FMS - NDI "Trich" 60 gal/yr. - Thru CE SLF (Sanitary Landfill Disposal Method).

AMS: Fire Control - "Trich" 160 gal/yr. through salvage.

EWS: "Trich:" 35 gal/yr. evaporation during process.

92CSG: Bowling Alley - Perchloroethylene, 110 gal/yr. evaporation during process.

Base Laundry - Perchloroethylene 550 gal/yr "? disposal." [19]

12. EPA 1981 Status Sheet for Non-Regulated Generators, dated 23 February 1983.  
Generator named: Fairchild Air Force Base. [32]
13. EPA form and Notification of Hazardous Waste Activity, Fairchild AFB, 17 July 1980. List includes the following hazardous wastes, non-specific sources:  
  
F001 (spent halogenated solvents used in degreasing)  
F003 (spent non-halogenated solvents)  
F005 (spent non-halogenated solvents)  
F002 (spent halogenated solvents) [25]
- B. Documentation that Fairchild AFB disposed of wastes at Colbert Landfill includes the following:
  1. Colbert Landfill Charge Customers. List includes: 92CSG/DEE, Attention: Gary Gespersion, Fairchild AFB, WA 99011 [8]  
August 1980  
February 1980  
May 1979
  2. Dump Receipts from Colbert Landfill [7]
    - a. U.S. Fairchild Air Force Base #2015  
30 October 1975  
for: 2 yds.  
signed by: R. J. McCormick
    - b. United States Air Force #2175  
Fairchild AFB  
5 January 1979  
for: minimum  
signed by: Richard McLaughlin, S.Sgt.
    - c. U.S. Fairchild AFB #3202  
? January 1979  
for: minimum  
signed by: John Pocuicki
    - d. U.S. Air Force, Fairchild AFB #3509  
28 September 1979  
for: minimum  
signed by: Richard McLaughlin S.Sgt.



c. Fairchild AFB, 92 CFS REG  
October 10, 1980  
for: 5 yds.

#9179

3. Letter to 92CSG/DEE  
Attn: Gary Jespersen, Fairchild AFB, from James Legat, Utilities Engineer,  
June 7, 1978, re: Landfill Charge Account letter of May 23, 1978. The  
letter grants Jespersen's request to have an account for refuse disposal  
service at the Spokane County landfills on a monthly basis. [18]
4. Purchase order from Fairchild AFB, Base Procurement Office to Spokane  
County Engineers Office, dated May 23, 1978, for: Non Personal Services -  
This request is to cover the cost of dumping fees for disposal of chemical  
wastes at the Spokane County disposal site near Colbert, Washington. [17]
5. Purchase order form from Base Contracting Division, Fairchild AFB, to  
Spokane County Engineers Office, July 28, 1980, for: Non personal services-  
This request is to cover the cost of dumping fees for disposal of chemical  
wastes at the Spokane county disposal site near Colbert, Washington. [27]
6. Deposition of William Schmidt, July 31, 1986. Schmidt was landfill operator  
at Colbert.  
On page 46, William Schmidt states that Fairchild Air Force Base used the  
landfill - "not on a regular basis, but that they did haul a few barrels now  
and then" (in the '70s). [5]
7. Deposition of Florence Schmidt, July 31, 1986.  
Florence Schmidt (page 14) states that Fairchild Air Force Base used  
Colbert Landfill on an irregular basis. [6]
8. Letter to John Anicetti, Spokane County Health District, from William  
Dobratz, Spokane County Utilities, June 4, 1980, re: Hazardous Waste  
Survey. The letter lists Fairchild AFB as a disposer of chemical waste at  
Colbert disposal site. [22]

Methyl Ethyl Ketone	25 gal/mo.
Poly Thinner	12.5 gal/mo.
Enamel Thinner	10 gal/mo.
Toluene	10 gal/mo.
Paint Remover	10 gal/mo.
Primer Wastes	10 gal/mo.

- C. Documentation that Fairchild AFB disposed of chemicals of concern at  
Colbert Landfill.
1. Colbert Landfill Dump Receipt #9174, June 13, 1980. U.S. Air Force,  
Fairchild AFB for 6 - 55 gal. drum of trichloroethene, signed by TSGT  
Richard McLaughlin. [7]



2. Summary

There exists sufficient evidence to support a conclusion that Fairchild AFB both used contaminants of concern and disposed of wastes at Colbert Landfill. There is also strong evidence that Fairchild AFB disposed of the contaminants of concern at Colbert. The documentation justifies sending a 104 Notice Letter to Fairchild Air Force Base.

II. A & M Manufacturing, Inc.  
a/k/a/ Anderson Miller Manufacturing Co.

A & M Manufacturing can be classified as a generator of hazardous waste and may fall under the scope of CERCLA Section 107 a(3). Information collected indicates A & M Manufacturing used and disposed of 1,1,1 trichloroethane and/or trichloroethylene. A & M Manufacturing is no longer an operating business, having sold out to Alumax in 1972. The last address for A & M Manufacturing was: Terminal Box 3107, Spokane, Washington, 99220.

1. Basis for Inclusion

A. Documentation that A & M Manufacturing used and purchased contaminants of concern includes the following:

1. Deposition of Russell Parish, former employee of A & M Manufacturing, August 1, 1986. Mr. Parish stated that A & M used carbon tetrachloride as a degreaser and later replaced the carbon tetrachloride with a similar type of solvent. It is possible the later solvent was 1,1,1 trichloroethane or trichloroethylene (page 16 of deposition). [34]
2. Statement by Joseph J. Floyd, former employee of A & M Manufacturing, 1987, taken by Robert Bailor, Private Investigator for Key Tronic. Mr. Floyd stated that A & M Manufacturing used "1,1,1 trichloroephane" as a degreaser, which is probably a mispronunciation of 1,1,1 trichloroethane. However it appears from his statement that Mr. Floyd was not very clear about the name of the chemicals used by A & M Manufacturing as degreasers (page 4 of statement). [35]

B & C. Documentation that A & M Manufacturing disposed of contaminants of concern at Colbert Landfill includes the following:

1. Deposition of Russell Parish, former employee of A & M Manufacturing, August 1, 1986. Mr. Parish testified that he disposed of degreaser solvents at Colbert Landfill for A & M Manufacturing (pages 5, 10, 12-15, 19). [34]
2. Statement of Joseph J. Floyd, former employee of A & M Manufacturing, June 4, 1987, taken by Robert Bailor, Private Investigator for Key Tronic. Mr. Floyd stated the employees of A & M Manufacturing hauled barrels of degreasing solvent out to Colbert Landfill for disposal. [35]



3. Activity Report, May 29 through June 4, 1987, by Robert Bailor, Private Investigator for Key Tronic. Bailor interviewed Vernon Peters, a former employee of A & M Manufacturing and Alumax. Peter stated that he hauled chemicals to Colbert Landfill. When he was asked if he remembered the name of the chemicals, he did mispronounce trichloroethylene. [158]
4. Activity Report, May 27, 1987, by Robert Bailor, Private Investigator for Key Tronic. Bailor interviewed Robert Schell, former purchasing agent for A & M Manufacturing and Alumax. Schell stated that A & M purchased trichloroethylene from Great Western Chemicals (approximately 50-100 gallons every 3 months). The chemical was a vapor degreaser used in cleaning parts. He stated that it was disposed of at Colbert Landfill. [157]

## 2. Summary

The information indicates that A & M Manufacturing used trichloroethylene and/or 1,1,1 trichloroethane and disposed of the waste solvents at Colbert Landfill. The documentation justifies sending a 104 Notice Letter to A & M Manufacturing.

## 3. Corporate History

1. Date of Incorporation: ?
2. Current Status: No longer in existence. A & M Manufacturing sold out to Alumax in 1972. Alumax is the corporate successor to A & M Manufacturing.
3. Domestic State: Washington.
4. Listings in Directory of Washington Manufacturers, published by the Trade Development Division of the Washington State Department of Commerce & Economic Development:

1968: Anderson-Miller Mfg. Co.: Howard Jenin, Pres., Glen R. Jackson, Gen. Mgr.; Gordon B. Hopkins, V. Pres.; Mrs. Clare Osborn, Sec.; Marvin P. Winton, Treas.  
Products: Sprinkler Irrigation, Portable Aluminum Irrigation Systems, Custom Aluminum Castings.

Address: Spokane Industrial Park.

1969: Anderson-Miller Mfg. Co.: Marion H. J. Miller, Pres.  
Address: Terminal Box 3107, Spokane, Washington 99220.

1971: A-M Manuf. Co.: Dewayne Stratton, Mgr.; Robert Schell, Materials Mgr.; Mrs. Clare Osborne, Controller.  
Products: Sprinkler Systems, Custom aluminum casting.  
Address: Bldg. No. 2, Spokane Industrial Park.

1973-75: A-M Manufacturing Co. (Div. of Amax Aluminum): Dewayne A. Stratton, Plant Mgr.  
Products: Irrigation equipment and systems.  
Address: N 3808 Sullivan Rd., Bldg. 2, Spokane, Washington. Terminal Box 3107, Spokane, Washington 99220.



5. Registered Agent: Clare M. Osborne  
Terminal Box 3107  
Spokane, WA 99220  
(1969)
6. A & M Manufacturing was apparently dissolved when it was bought out by Alumax in 1972. However, at the time of the sale, A & M was a subsidiary of the Rucker Co., a national corporation with its main offices in Texas. Rucker, in turn, is a subsidiary of NL Industries; however, NL Industries did not acquire an interest in Rucker until 1977, five years after the divestiture of Anderson Miller (A & M).

### III. Aluminum Mill Products, Inc. - a/k/a/ Alumax

Alumax can be classified as a generator of hazardous waste and may fall under the scope of CERCLA 107 a(3). The information collected suggests that Alumax used and disposed of trichloroethylene, 1,1,1 trichloroethane, and methylene chloride.

Alumax no longer operates a business in Spokane. In 1984, Travis Pattern and Foundry purchased the irrigation products manufacturing facility and Alumax closed its business. The last address used by Alumax in Spokane was: N. 3808 Sullivan Rd., Bldg. 2, Spokane, WA 99216.

#### 1.. Basis for Inclusion

- A. Documentation indicating Alumax used the contaminants of concern, specifically trichloroethylene, 1,1,1 trichloroethane, and methylene chloride, includes the following:
  1. List of Great Western Chemicals' customers in 1980 shows purchase by Alumax of trichloroethylene in 1976, 1977, 1978; 1,1,1 trichloroethane 1976, 1978, 1980, 1981. [9]
  2. Great Western Chemicals invoices indicating purchase of 1,1,1 trichloroethane in 1980, 1981, 1982, 1984. [45-87]
  3. Alumax credit memos, and purchase orders indicating purchase (from Great Western Chemicals) of 1,1,1 trichloroethane and trichloroethylene in 1981 through 1984. [64-87]
  4. Letter to Great Western Chemicals from William Ellis, Alumax dated 3/26/81 requesting transport of hazardous waste: ("In addition we generate approximately 4,000 gallons per year of spent 1,1,1 trichloroethane, methylchloroform") with attached Material Safety Data Sheet (August 31, 1978) listing 1,1,1 trichloroethane, methylchloroform as wastes. [168]
  5. Chemical Transportation Manifest, 5/15/81 (Chem-Security Systems), Alumax as Generator. Waste description includes tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1 trichloroethane. [170]



6. Letter to Great Western Chemicals from William Ellis, Alumax dated January 15, 1982, requesting an authorization permit to dispose of approximately 4,000 gallons per year of spent trichloroethylene. [169]
7. Environmental Review Worksheet, Alumax Irrigation Products, March 22, 1983 revised June 8, 1983. Page 2 lists trichloroethylene as raw material brought into the plant. Page 19, Solid Waste Summary, lists TCE (trichloroethylene) & Oil as waste (55 gal.yr.). [171]
8. Hazardous Waste Manifest, 6/20/83, for transport by Joy Motor Freight of waste trichloroethylene generated by Alumax. [172]
9. Generators' Waste Material Profile Sheet (form), Chem-Security Systems. Lists Alumax as generator and waste as trichloroethylene and oil and grease. 1/17/84. [167]
10. Generator Annual Dangerous Waste Report (form 4), April 22, 1985. Hazardous waste listed includes 1,1,1 trichloroethane and methylene chloride.
11. Hazardous Waste Manifest, 7/17/84. Listing Alumax as generator; wastes as 1,1,1 trichloroethane and methylene chloride (attached note suggests the 1,1,1 trichloroethane may have been trichloroethylene in mislabeled drums).
12. Letter to Elizabeth Tubbs, Chem-Security Systems from Edwards Chiong, Hazardous Waste Section, Oregon Department of Environmental Quality. Dated 4/16/81, regarding disposal request No. 1131. The letter cites Alumax Irrigation Products as waste source, and 1,1,1 trichloroethane and methylchloroform as materials for disposal.
13. Generator Annual Hazardous Waste Report (EPA) (form) 1/10/83. Alumax lists EPA Hazardous Waste No. F008, F007, F001. [39]
14. Generator Annual Hazardous Waste Report for 1983, dated 1/31/84. Alumax lists EPA Dangerous Waste Nos. F007, K062. [40]
15. WDOE form: Notification of Dangerous Waste Activities. Alumax dated February 26, 1986. [41]
16. WDOE form: RCRA/WAC 173-303 Dangerous Waste Compliance Checklist. Alumax dated August 24, 1983, lists trichloroethylene as dangerous waste. [38]

B & C. Documentation of disposal of contaminants of concern at Colbert Landfill by/for Alumax includes the following:

1. Deposition of Russell Parish, former employee of A & M, and later Alumax (which bought out A & M in 1972). He testified that during his employment for A & M and Alumax, these companies had a large



"degreasing" vat and the liquid wastes from the vat were disposed of at times at Colbert Landfill. Parish did not know the exact name of the solvent used in the degreasing vat; however, it is very probable that the solvent was trichloroethylene, given the description provided by Mr. Parish and the use to which it was put by A & M and Alumax - i.e., cleansing of metal parts by heating the solvent and allowing the fumes to rise to clean the parts. In support of this assumption is the testimony of an employee of Travis Pattern & Foundry which confirms that the same degreasing vat used at Travis involved the use of trichloroethylene. [34 and 146]

2. Statement of Joseph J. Floyd, former employee of Alumax and A & M (taped interview with Robert Bailor, Investigator for Key Tronic June 4, 1987). Floyd stated that "1,1,1 trichloroethane" was used as a degreaser fluid, and that he understood that the waste was disposed of (for a period of 3 years) at Colbert Landfill. He, however, was only personally familiar with disposal at Mica Landfill. Floyd gave the name of other employees who took drums of solvents to Colbert Landfill. (Note: Floyd could not independently remember the name of the degreaser fluid used, but recognized the name "1,1,1 trichloroethane" when it was suggested by the investigator). [35]
3. Activity Report, May 29 to June 4, 1987, by Robert Bailor, Private Investigator for Key Tronic. Bailor interviewed Vernon Peters, a former employee of Alumax and A & M. Peter stated he hauled chemicals to Colbert Landfill. He was asked if he remembered the names of the chemicals, and, according to Bailor he did mispronounce "trichloroethylene". [158]
4. Activity Report, May 27, 1987, by Robert Bailor, Investigator for Key Tronic. Interview with Robert Schell, former employee of A & M and Alumax. Schell stated that A & M and Alumax purchased trichloroethylene (approximately 50-100 gallons every 3 months from Great Western Chemicals). The chemical was a vapor degreaser used in cleaning parts. He stated that when it was disposed of, it was a heavy oil sludge and that as far as he knew, it was only taken to Colbert Landfill. [157]

## 2. Summary

There exists sufficient documentation that Alumax purchased, used and disposed of trichloroethylene, 1,1,1 trichloroethane, and methylene chloride. The evidence supporting the allegation that Alumax disposed of these chemical wastes at Colbert Landfill is also documented sufficiently and justifies sending as 104 Notice Letter to the company.

Alternatively, Alumax may be pursued as corporate successor to A & M Manufacturing, which has also been identified as a potentially responsible party in this report.

Alumax Irrigation Products is no longer an operating business in Spokane and thus the parent corporation, Alumax Cast Products in California, should be pursued.



### 3. Corporate History

A & M Manufacturing, Alumax and Travis Pattern & Foundry all used the same manufacturing facility in the Spokane area during the 1970's. A & M owned the plant until February 1972 when it was sold to Alumax. Alumax was then bought out by Travis Pattern & Foundry in April 1984. Alumax no longer operates a facility in Spokane. Alumax is a national corporation with its main offices in California.

1. Date of Incorporation: Date qualified, August 11, 1977, as Alumax Fabricated Products, Inc. Established (as Amax Aluminum) in 1947(?).
2. Current Status: No longer operating a business in Spokane; sold out to Travis Pattern & Foundry in April 1984. Parent corporation is still in existence in California.
3. Domestic State: Delaware.
4. Listings in Directory of Washington Manufacturers, published by the Trade Development Division of the Washington State Department of Commerce and Economic Development:

1973-1975 A & M Mfg. Co. (Division of Amax Aluminum). Dewayne A. Stratton, Plant Mgr.

Products: Irrigation equipment and systems.

Address: N. 3808 Sullivan Rd., Bldg. 2, Spokane, Washington. or  
Terminal Box 3107, Spokane, Washington.

1977 Alumax Irrigation Products. Dwayne A. Stratton, Plant Mgr.  
Address the same.

1978 - 79 Alumax Irrigation Products, Division Alumax Fabricated Products, T. H. Longmire, Gen. Mgr.

Address: Terminal Box 3107, Spokane, Washington 99220

1980 Alumax Irrigation Products. Harvey Brady, Gen. Mgr. Address the same.

1982 - 83 Alumax Irrigation Products. Shelly Horne, Gen. Mgr. Address the same.

### 5. Corporate Succession

- a. Alumax Irrigation Products (Division of Alumax Fabricated) is the corporate successor to Alumax Mill Products, which in turn, is the corporate successor to A & M Manufacturing.
- b. Alumax closed its business/operations in Spokane in April 1984, selling its property/lease and equipment to Travis Pattern & Foundry.
- c. Alumax Irrigation Products was a subsidiary of Alumax Cast Products which currently has its headquarters at 400 South El Camino Rd., San Mateo, California, 99402.



6. Business Operations: (from Environmental Review Worksheet for Alumax Irrigation Products, 6/8/83. [171]).

The Alumax, Spokane facility was a foundry and machine shop producing farm irrigation systems composed of steel and aluminum parts. It also operated as a custom foundry; some custom galvanizing was done.

In the foundry section, aluminum scrap or foundry ingot was charged into one of five gas fired melt furnaces. Molten aluminum was poured into either permanent mold casts, die cast or sand cast. Cast pieces were removed and finished by sawing rough edges and grinding. This was followed by a heat treat furnace and quench tank. The die casting area has four melting units, one for each die casting machine. One of the die casting machines is used for zinc, the other three for aluminum.

Ancillary operations were roll forming of galvanized steel strips to form irrigation system wheel hubs, hot dip zinc galvanizing for various parts, vapor degreasing, and a machine shop for producing various associated parts, and a small painting area for painting irrigation system chassis. Punch presses (250 ton, 150 ton, 90 ton, 60 ton) were used to stamp a variety of parts for irrigation products.

IV. William Schmidt

William Schmidt was the operator of Colbert Landfill at the time hazardous substances were disposed of at the site. Schmidt may fall under the scope of CERCLA Section 107 a(2).

William Schmidt's current address is: (b) (6), Spokane, Washington.

1. Basis for Inclusion

Documentation indicating that William Schmidt acted as operator of Colbert Landfill from 1971 to 1983, during which time contaminants of concern were disposed of, includes the following:

1. Deposition of William Schmidt, July 31, 1986. Schmidt testifies that during the period of time he was landfill operator, contaminants of concern were disposed of at Colbert Landfill by Key Tronic, U.S. Air Force and Husky Oil. [5]
2. Notice of Completion of Public Works Contract, Oct. 19, 1977. Description of Contract and Colbert disposal site. Contractor's Name: William Schmidt. [88]

2. Summary

There is sufficient documentation that William Schmidt held the position of landfill operator at a time contaminants of concern were disposed of at Colbert Landfill. The information justifies sending a 104 Notice Letter to Mr. Schmidt.



## V. United Paint & Coatings

United Paint & Coatings (United) can be classified as a generator of hazardous waste and may fall under the scope of CERCLA Section 107 a(3). The information collected suggests that United used and disposed of contaminants of concern, specifically methylene chloride and 1,1,1 trichloroethane.

United Paint & Coatings' address in Spokane is: E. 1130 Sprague Ave., Spokane, Washington, 99202, (509) 535-1467.

### 1. Basis for Inclusion

#### A. Documentation indicating that United Paints purchased and used methylene chloride and 1,1,1 trichloroethane includes the following:

1. Van Waters and Rogers, invoices and credit memos documenting that United Paint purchased methylene chloride in 1981 and 1982. [91-108]
2. United Paint & Coatings, purchase order addressed to Chemical Securities System, Inc. (Bellevue, Wa) to cover cost of disposal of 218 drums (55 gal. each) of Hazardous Waste, Oct. 1981. [90]
3. Chemical Security Systems, Inc. invoice documenting the disposal for United of methylene chloride/1,1,1 trichloroethane sludge at Arlington, Oregon disposal site, September 1982. [10]
4. Waste Management, Inc., Generators Waste Material Profile Sheet (form) for United, showing waste product of methylene chloride/1,1,1 trichloroethane liquid, 1982. [109]
5. List of Chemical Central Corporation Sales of Subject Chemicals indicating purchase of methylene chloride (MYCH) by United Paint in 1981 (1,620 gal. and 872 gal.) (Information received by Key Tronic from telephone conversation with Chemical Central corporate counsel in Chicago. Information came off year end summaries of sales for Chemical Central's Spokane office.) [11]

#### B. Documentation showing United Paint used Colbert Landfill as a disposal site includes (waste not specified):

1. September 1980, Septic Pumpers Record Form (for Spokane County Health District) indicates that Gene's Septic Service disposed of 3,000 gals. of waste generated by United Paint at "Colburn" dump site on 7/12/80. (Note: As there is no Colburn Landfill near Spokane, it has been assumed that the form is referring to Colbert Landfill.) [89]
2. Colbert Landfill Charge Customers list includes a listing for United Paint in August 1980, February 1981, May 1979. [8]



3. Memo to File - Key Tronic from James Moore, attorney, Perkins Coie, regarding conversation with Jim Legat of Spokane County Utilities, dated July 23, 1987. Jim Legat stated that "he knew they (United Paint) regularly brought a good load of drums to a county landfill." [166]
  4. Memo to William Radobenko from Carol Silva, dated January 14, 1987, regarding: History of Previous Practices of Hazardous Waste Disposal, United Paint (received from - Key Tronic's files). The memo states that Colbert Landfill was used by United. [11]
- C. Documentation that United disposed of wastes containing contaminants of concern at Colbert Landfill is not conclusive. However, circumstantial evidence does indicate a strong possibility that methylene chloride and 1,1,1 trichloroethane from United Paint were disposed of at the site. The supporting information includes the following:
1. There exists documentation that Gene's Septic Service disposed of wastes for United Paint in 1980:
    - A. Spokane County, Utilities Dept. Hazardous Waste Survey. Letter to John Anicetti, Spokane County Health District from William Dobratz, Utilities Director, June 4, 1980, indicates that Gene's Septic Service disposed of paint wastes from United Paint at Mica Landfill. This supports the claim that Gene's Septic Service did, at times, haul wastes for United. [22]
    - B. Septic Pumpers Record Form, 1980, for Gene's Septic Tank. The form shows disposal of wastes for United Paint at Colbert by Gene's Septic Service, on 7/12/80. [89]
    - C. Colbert Landfill Dump Receipts #9028 dated 7/14/80 shows Gene's Septic Service disposing of 2,700 gal. of solvent and paint waste. (However, the receipt does not specify that the waste was generated by United Paint). [7]
  2. Activity Report dated July 3 - July 9, 1987, Robert Bailor, Private Investigator for Key Tronic Corporation. Bailor interviewed Leonard Pederson on July 7, 1987. Pederson started Gene's Septic Service in 1979. He stated that in 1980 he hauled solvents from United Paint to the Colbert Landfill. Pederson said "that each time he hauled solvents (for United Paint) that it was not more than or very little more than 500 gallons at a time, and that because of the nature of the solvent, he would have to get it off his truck right away and he would go directly to Colbert after loading at United..." He stated that he hauled for United approximately twice a year. [160]



## 2. Summary

There is documentation indicating that United Paint purchased, used and disposed of methylene chloride and 1,1,1 trichloroethane. There is also evidence that United Paint hired Gene's Septic Service to haul waste for disposal. However, the evidence that United Paint disposed of the contaminants of concern, specifically, at Colbert Landfill, via Gene's Septic Service, is weaker. This link is only established from reports of the private investigator hired by Key Tronic and by inference from dump receipts for hauls by Gene's Septic Service. However, the information is sufficient enough to justify sending a 104 Notice Letter to United Paint & Coatings.

## 3. Corporate History

Listings in the Directory of Washington Manufacturers, published by the Trade Development Division of the Washington State Department of Commerce and Economic Development:

1978 - 79      United Paint Mfg., Inc.  
                  E. 1130 Sprague Ave.  
                  Spokane, Washington 99202  
                  (509) 535-4131

                  Established in 1945  
                  President: Nathane Grossmann  
                  Products: Specialty coatings, roof coatings, water proofing.

1982 - 83      Same listing.

In the 1985 Spokane Telephone Directory the following listing was found:

                  United Coatings  
                  E. 19011 Cataldo  
                  Greenacres  
                  (509) 926-7143

In the 1987 Spokane Telephone Directory, the following listing was found:

                  United Paint  
                  Downtown Store:    E. 1130 Sprague  
  Spokane, Washington  
  (509) 535-1467

                  Valley Store:        N. 21 Skipworth  
  Spokane, Washington  
  (509) 926-9273

There was no information found that suggests that there were any subsidiaries of United Paint & Coatings, or that United was affiliated with a parent corporation.

## VI. Gene's Septic Service

Gene's Septic Service can be classified as a transporter of hazardous wastes and may fall under the scope of CERCLA Section 107(a)(4). The information collected suggests that Gene's Septic Service transported contaminants of concern for both United Paint and Coatings and Scollard's Dry Cleaning Service and disposed of these wastes at Colbert Landfill.

Gene's Septic Service is no longer in operation in Spokane. In 1985, the truck was sold to Leo Fackler, owner of Country Home Septic (now Discount Septic) and Gene's Septic Service discontinued business. The last address recorded for Gene's Septic Service is 6801 N. Division, Spokane, Washington.

### 1. Basis for Inclusion

Disposal of Hazardous Waste at Colbert Landfill. Documentation that Gene's Septic Service disposed of hazardous waste at Colbert Landfill includes:

1. Septic Pumpers Record Form, Spokane County Health District, September 1980. The record establishes that Gene's Septic disposed of 3,000 gals. of waste from United Paint at "Colburn Dump." (As there is no Colburn dump in the vicinity, it is assumed that Colbert dump is the disposal site) on 7/12/80. [89]
2. Activity Report, July 3, 1987 - July 9, 1987. Robert Bailor, Private Investigator working on behalf of Key Tronic. The report states that Bailor interviewed Leonard Pederson, owner of Gene's Septic Service. (July 7, 1987), Pederson said that in 1980 he hauled solvents from United Paint to the Colbert Landfill (approximately 500 gallons twice a year). [160]
3. Activity Report, July 3, 1987 - July 9, 1987, Robert Bailor, Private Investigator working on behalf of Key Tronic. Interview with Leonard Pederson, owner of Gene's Septic Service (July 7, 1987). Pederson stated that in 1980 he picked up dry cleaning solvents from Scollard's Laundry & Dry Cleaning (anywhere from 1,000 to 2,000 gallons on one trip) and hauled them to Colbert. [160]
4. Deposition of William Schmidt, July 31, 1986. Colbert Landfill operator - 1971, William Schmidt stated that he remembers Gene's Septic Service dumping at Colbert Landfill; however, they only brought sand and came to clear out their tanks: "But there was no water with it and -- oh, probably a little bit, but basically it was sand that they wanted to get rid of." [5]
5. Spokane County Utilities Department, listing of account numbers and names for disposal at Colbert Landfill:

10/8/80	#00061	Gene's Septic Tank	6.75	
4/17/81	#00061	Gene's Septic Tank	-0-	
02/6/82	#00061	Gene's Septic Tank	-0-	
01/7/82	#00061	Gene's Septic Tank	-0-	[112-115]



6. Colbert Landfill Charge Customer List: [8]  
August 1980           Gene's Septic Tank  
                          S. 3212 Glenn Ct.  
                          Spokane, WA 99206
- February 1980       Gene's Septic Tank  
                          N. 6801 Division  
                          Spokane, WA 99208
7. Colbert Landfill Dump Receipts: [7]  
9-11-80 #9122 Gene's Septic, for 2,000 gal/flammable liquid signed by Mel William.  
7-14-80 #9028 Gene's Septic, for 2,700 gal/solvent and paint waste signed by Mel Williams.

2. Summary

There is sufficient documentation to conclude that Gene's Septic Service disposed of solvents at Colbert Landfill. There is no documentation that these solvents contained any contaminants of concern; however, information provided by the reports of the private investigator working on behalf of Key Tronic indicates that these solvents included waste products of a paint company and a dry cleaning establishment. Therefore, it is likely that the waste solvents contained the contaminants of concern. The information collected justifies sending a 104 Notice Letter to the former owner of Gene's Septic Service.

3. Business History

Gene's Septic Service was a small operation and closed down in 1985. The following information was obtained from the Activity Report, July 3 - 9, 1987, by Robert Bailor, Private Investigator for Key Tronic [160]:

Gene's Septic Service first registered in County, June 21, 1979:

address:               680 North Division  
owner:                 Leonard B. Pederson  
manager:              Eugene Hostetler

July 1979 report to County:

owner:                Len Pederson  
subcontractor:       Gene Hostetler

November 1979 report to County:

owner:                Len Pederson  
subcontractor:       Mel Williams

1980 report to County:

owner:                Len Pederson  
manager:              Mel Williams

1981 report to County:

owner/manager:       Mel Williams

The addresses listed for Gene's Septic Service in 1979 - 80 were:

Valley: E. 6317 11th  
Spokane, WA  
535-0020

Northside: N. 6801 Division  
Spokane, WA  
483-4562

In 1985, the truck operated by Mel Williams for Gene's Septic Service was sold to Leo Fackler, owner of Country Home Septic (now Discount Septic).

#### VII. Scollard's Dry Cleaning

Scollard's Dry Cleaning can be classified as a generator of hazardous waste and may fall under the scope of CERCLA Section 107(a)(3). The information collected suggests that Scollard's Dry Cleaning purchased and used tetrachloroethylene, and possibly disposed of this chemical waste at Colbert Landfill.

The addresses listed for Scollard's Dry Cleaning are:

West 1310 Northwest Blvd. (main plant)  
South 315 Washington  
North 4925 Division  
South 910 Monroe  
East 11512 Sprague

President: Jerry Scollard

#### 1. Basis for Inclusion

A. Documentation that Scollard's purchased and used contaminants of concern includes the following:

1. Invoices from Van Water and Rogers showing purchase of "bulk perc/perk" by Scollard's Drive-In Cleaners in 1981. [116-135]
2. Activity Report, 7/12/87, Robert Bailor, Private Investigator for Key Tronic. Bailor interviewed Tom Griffith, former employee of Scollard's. Griffith stated that Scollard's used both petroleum and perchloroethylene (tetrachloroethylene). [16]

Robert Bailor interviewed Danny McDermott, 7/13/87, former employee of Scollard's. Mr. McDermott stated that Scollard used a petroleum cleaner and perchloroethylene (tetrachloroethylene) but that he didn't believe Scollard's ever had more than 500 gallons of perchloroethylene on hand at one time and only about 1,000 of the petroleum cleaner at one time. [16]



B. Documentation indicating that Scollard's disposed of wastes at Colbert Landfill includes the following:

1. Activity Report, July 3 - 9, 1987, Robert Bailor, Private Investigator, working on behalf of Key Tronic. Bailor interviewed Len Pederson (July 7, 1987), owner of Gene's Septic Service. Pederson stated that in 1980 he made a pick up of solvents from Scollard's Laundry & Dry Cleaning and hauled them to Colbert Landfill (estimated 1,000 to 2,000 gallons/on one trip). [160]

C. Documentation indicating that Scollard's disposed of contaminants of concern at Colbert Landfill: None.

2. Summary

There is sufficient documentation to indicate that Scollard's Dry Cleaning purchased and used tetrachloroethylene (perchloroethane).

The only documentation that Scollard's Dry Cleaning disposed of contaminants of concern at Colbert is the activity report of Robert Bailor, Private Investigator working for Key Tronic, which infers that Gene's Septic Service hauled solvents from Scollard's to Colbert Landfill. This is not corroborated elsewhere, however it is sufficient to justify a 104 Notice Letter to Scollard's Dry Cleaning.

3. Corporate History

Scollard's Dry Cleaning is a family owned business and is still in operation in Spokane. The President is Jerry Scollard.

VIII. Husky Oil

Husky Oil can be classified as a generator of hazardous waste and may fall under the scope of CERCLA Section 107(3)(a). The information collected suggests that Husky Oil disposed of 1,1,1 trichloroethane at Colbert Landfill.

Husky Oil is no longer an operating business in Spokane. The last address held by the company was N. 220 Haven, Spokane, Washington (1983).

1. Basis for Inclusion

Documentation indicating that Husky Oil disposed of contaminants of concern at Colbert Landfill include:

1. Deposition of William Schmidt, former landfill operator at Colbert Landfill (July 31, 1986). Schmidt stated that Husky Oil (using Williams Trucking as transporter) disposed of 1,1,1 trichloroethane at Colbert Landfill. He testified that Williams Trucking hauled approximately 400-500 gallons of 1,1,1 trichloroethane to Colbert from Husky Oil on at least one occasion (page 34-36 deposition). [5]



2. Summary

The information supporting the conclusion that Husky Oil transported and disposed of contaminants of concern at Colbert Landfill is minimum. The only relevant documentation is the deposition of the former landfill operator. However, this should be enough to justify sending a 104 Notice Letter to Husky Oil.

3. Corporate History

The 1980 Spokane telephone directory gave the following listings for Husky Oil:

Husky Oil, R. G. Lamon, Distr. Mgr., N. 4327 Thor St.  
Husky Oil, Light Oil Div., Phil Fransworth, Mgr., N. 220 Haven St.  
Husky Oil, New Prod. Division, L. H. Lorenzen, Repres., N. 7322 Division St.,  
Suite 210  
Husky Service, Don Alsacker, N. 2706 Monroe  
Husky Service Station, John Hartnett, Mgr., 51621 Ray St.

The corporate headquarters was listed in Standard and Poor's (1984):

Husky Oil Ltd.  
Husky Oil Operations Ltd. and Husky Oil Co., subsidiary of Nova, an Alberta  
Corp., 505 5th St. S.W., Calgary Alta., Canada T2P 3G7  
(403)267-6111  
President and Chief Executive Officer: L. M. Rasmussen  
Products include crude oil, natural gas, refined petroleum products, charcoal  
briquets and activated charcoal.

IX. Williams Trucking

Williams Trucking can be classified as a transporter of hazardous waste and may fall under the scope of CERCLA Section 107(4)(a). The information collected suggests that William Trucking transported 1,1,1 trichloroethane and disposed of such at Colbert Landfill.

1. Basis for Inclusion

A. Documentation that Williams Trucking transported and disposed of contaminants of concern include the following:

1. Deposition of William Schmidt, former landfill operator at Colbert Landfill (July 31, 1986). Schmidt stated that William Trucking hauled approximately 400-500 gallons of 1,1,1 trichloroethane to Colbert from Husky Oil on at least one occasion (pg. 34-36 deposition). [5]



2. Summary

The information supporting the conclusion that Williams Trucking transported and disposed of contaminants of concern at Colbert Landfill is minimum. The only relevant documentation is the deposition of the former landfill operator. However, this should be enough to justify sending a 104 Notice Letter to Williams Trucking.

3. Business History

The Spokane telephone directory listings for Williams Trucking are as follows:

1983 Williams JJ Trucking Ltd. E. 5711 3rd (509)535-2411  
1985 (same as above)  
1987 (yellow pages)  
Williams JJ Trucking Ltd.  
E. 5711 3rd (509) 535-2411  
Petroleum Products, acids, chemicals,  
chemical fertilizer, dry bulk commodities.

It is not certain that Williams JJ Trucking Ltd. is the same "Williams Trucking" identified by Schmidt as hauling wastes for Husky Oil. In his deposition, Schmidt does not state what year Husky Oil disposed of the solvents at Colbert Landfill. The last address found for Husky Oil was for 1983. Therefore, the Williams Trucking referred to by Schmidt must have operated in or before 1983. The earliest listing found for Williams JJ Trucking Ltd. was in the 1983 Spokane telephone directory.

X. Van Waters and Rogers

Van Waters and Rogers is a supplier of chemicals. The firm can be classified as a transporter of hazardous waste and may fall under the scope of CERCLA Section 107 a(4).

The current mailing address for Van Waters and Rogers is Box 2767, Spokane, Washington, 99220. The plant address is East 4515 Wisconsin Ave., Spokane, Washington.

1. Basis for Inclusion

A. Documentation indicating that Van Waters and Rogers sold and transported contaminants of concern includes the following:

1. Invoices from Van Waters and Rogers to United Coating re: sale of methylene chloride (1981). [91-102]
2. Credit memos from Van Waters and Rogers to United Coating re: sale of methylene chloride (1981). [103-108]
3. Invoices from Van Waters and Rogers for sale of "bulk perk" (tetrachloroethylene) to Scollard's Drive-IO n Cleaners (1981).



B. Documentation that Van Waters and Rogers disposed of waste at Colbert Landfill includes the following:

1. Landfill Charge Customers, Colbert Landfill listings for Van Waters and Rogers, Inc. in Aug. 1969, Feb. 1970, June 1970, Sept. 1976, May 1979, Feb. 1980 and Aug. 1980.
2. Spokane County Health Department Interoffice memo to File from John Anicetti. 12/11/79 re: Jim Legat's conversation with Burns of Van Waters and Rogers concerning disposal of seventeen 55-gallon drums of Ferric Chloride at Colbert Landfill.

C. Documentation that Van Water and Rogers disposed of contaminants of concern at Colbert Landfill: None.

2. Summary

There is sufficient documentation to indicate that Van Waters and Rogers sold and transported contaminants of concern. There is also documentation indicating that the firm disposed of wastes at Colbert Landfill.

There has been no documentation found that establishes Van Waters and Rogers disposed of the contaminants of concern at Colbert Landfill. However, the information collected does justify sending a 104 Notice Letter to the firm.

3. Corporate History

Van Waters and Rogers is a division of Univar.

The Washington Manufacturers Register, published by Times Mirror Press (1984-85) had the following listing:

Univar  
1600 Norton Bldg.  
Seattle, Washington 98104  
(206) 447-5911  
Established in 1920  
President: J. H. Wiborg

XI. Travis Pattern & Foundry

Travis Pattern & Foundry (Travis) can be classified as a generator of hazardous waste and may fall under the scope of CERCLA Section 107 a(3). Information collected indicates Travis purchased and used trichloroethylene and 1,1,1 trichloroethane.

The current address for Travis Pattern & Foundry is P.O. Box 6325, Spokane, Washington, 99207 or E. 1413 Hawthorne Rd., Spokane, Washington, 99207, (509) 466-3545.



1. Basis for Inclusion

A. Documentation that Travis purchased and used contaminants of concern include:

1. Invoices from Great Western Chemicals Company showing purchase by Travis Pattern of trichloroethylene, tri-ethane, and GW 5050 Solvent (Tri-ethane/Chev.Thin #350B) Paint Thinner. 1977. [136-143]
2. Affidavit of Jonas Stutzman, employee of Travis Pattern, May 5, 1987. Stutzman states that Travis used small amounts of 1,1,1 trichloroethane for cleaning materials. [145]
3. Deposition of Jonas Stutzman, employee of Travis Pattern, August 6, 1986. Stutzman testified that Travis Pattern purchased and used 1,1,1 trichloroethane. [146]
4. Activity Report 7/17/87 - 7/23/87, Robert Bailor, Private Investigator for Key Tronic. Spoke with Dean DeShane, attorney for Great Western Chemicals, Portland, who stated that Great Western Chemicals did receive four drums of trichloroethylene or 1,1,1 trichloroethane (he wasn't sure of the pronunciation) from Travis Pattern & Foundry in January 31, 1983. [162]

B and C. Documentation that Travis disposed of waste (contaminants of concern or other) at Colbert Landfill: None.

2. Summary

There is sufficient documentation that Travis Pattern purchased and used 1,1,1 trichloroethane. However, there is no documentation that Travis disposed of any waste at Colbert Landfill.

There is a possibility that Travis may be held liable for disposal of contaminants of concern at Colbert Landfill as the successor corporation to Alumax. If this link is established, it will provide justification for sending a 104 Notice Letter to Travis Pattern & Foundry (see Corporate History below).

3. Corporate History

Date Established: 1935  
Domestic State: Washington  
Directors of Corporation (1984): G.A. Garske  
Travis Gasrske  
Jonas Stutzman

Registered Agent: Gene A. Garske  
E. 1413 Hawthorne Rd.  
P.O. Box 6325  
Spokane, WA 99207



The Washington Manufacturer's Register, published by Times Mirror Press, had the following listings:

1974: Travis Pattern Works and Brass Foundry  
2211 N. Ruby  
Spokane, Washington 99207  
President: G. A. Garske

1978 - 79: Travis Pattern and Foundry  
2211 N. Ruby  
Spokane, Washington 99207  
Established in 1935  
President: G. A. Garske

1984 - 85: Travis Pattern and Foundry  
P.O. Box 6325  
E. 1413 Hawthorne Rd.  
Spokane, Washington 99207  
Established in 1935  
President: G. A. Garske

Alumax, A & M Manufacturing and Travis Pattern & Foundry all used the same manufacturing facility in the Spokane area during the 1970's. Alumax bought the facility from A & M in approximately 1973. Travis Pattern & Foundry bought the facility from Alumax in 1984. A number of key employees, including Dwayne Stratton (General Manager for Alumax), continued on with Travis after the purchase from Alumax.

The information collected does not justify naming Travis Pattern & Foundry as corporate successor to Alumax Irrigation Products. Generally, to be held liable as a corporate successor, the purchasing corporation must (1) acquire substantially all of the assets of the original corporation; (2) hold itself out to the public as a continuation of the original corporation; and (3) benefit from the goodwill of the original corporation.

Here, Travis Pattern & Foundry did acquire Alumax's interest as lessee in the space at Spokane Industrial Park and the equipment owned and located at the leased premises, as well as rights held by Alumax for the use of names, logos, and trade styles for Western, A-M, and Trunnel product lines. [144]

However, Travis did not assume Alumax's relationship with Valmont International, nor did it assume responsibility to any customers, distributors, dealers, or suppliers previously dealing with Alumax. Without further supporting evidence, it cannot be assumed that Travis Pattern & Foundry held itself out to the public as a continuation of Alumax Irrigation Products. The evidence does not indicate that Travis benefited from the goodwill of Alumax. [144]

Therefore, Travis Pattern & Foundry should not be pursued as the corporate successor to Alumax Irrigation Products and should not be held liable for acts of Alumax which fall under the scope of CERCLA.



## XII. Columbia Lighting, Inc.

Columbia Lighting can be classified as a generator of hazardous waste and may fall under the scope of CERCLA Section 107 a(3).

The current address for Columbia Lighting, Inc. is North 3808 Sullivan Road, Spokane, Washington, 99220.

### 1. Basis for Inclusion

There was no documentation found that indicated Columbia Lighting used or purchased contaminants of concern. Nor was documentation found that Columbia Lighting disposed of waste at Colbert Landfill.

The information collected regarding Columbia Lighting indicates that the company disposed of two types of sludge at Mica Landfill: (1) residue from water wash spray booth; (2) residue from the bottom of the large waste water holding tank.

These wastes were tested for toxicity. Findings were considerably below maximum allowable levels established in the May 19, 1980, Federal Register 40 CFR 261.21, 261.22, 261.23 and did not exhibit any of the established four hazardous waste characteristics shown in the federal register. In addition, acute toxicity bioassay tests were performed on juvenile trout using samples of waste from the spray booth and holding tank (1981). Neither sample was acutely toxic to rainbow trout at 1,000 ppm level.

1. Letter to Columbia Lighting from Linda Baker, Bio Med Research Laboratories, November 23, 1981 re: Acute toxicity bioassay tests results. [154-155]
2. Letter to Damon Taam, County Utilities Engineer from John Anicetti, Spokane County Health District, December 15, 1981, re: disposal of Columbia Lighting paint sludge. [150]
3. Letter to Damon Tam, Spokane County Utilities, from Jack Leonard, Columbia Lighting, December 16, 1981, re: Permission by WDOE to dispose of paint sludge at Mica Landfill. [151]
4. Letter to Jerry Neal, Lukin & Annis P.S. from Damon Taam, Spokane County Utilities, Aug. 23, 1983, re: The lack of documentation in County Utilities Dept.'s files that Columbia Lighting used 1,1,1 trichloroethane or disposed of the chemical at Colbert Landfill. [156]
5. Letter to Carl Neuchterlein, WDOE, from Jack Leonard, Columbia Lighting, July 21, 1981 re: Request to dispose of paint sludge in local landfill; attached lab analysis from Lauck's Testing Laboratory. No. 73414, June 25, 1981. [148 and 153]



## 2. Summary

The information collected regarding Columbia Lighting does not indicate that the company used or disposed of any contaminants of concern at Colbert Landfill. The documentation does not justify sending a 104 Notice Letter to Columbia Lighting.

## XIII. Great Western Chemicals Company

Great Western Chemicals Company can be classified as a supplier and transporter of hazardous waste and may fall under the scope of CERCLA 107 a(3) and (4). The information collected suggests that Great Western Chemicals sold, transported and recycled contaminants of concern, specifically methylene chloride, 1,1,1 trichloroethane and trichloroethylene.

### 1. Basis for Inclusion

#### A. Documentation that Great Western Chemicals Company sold contaminants of concern includes the following:

1. Series of invoices, purchase orders and credit memos documenting the sale of trichloroethylene to Alumax in 1980-1984. [43-87]
2. Generator Annual Hazardous Waste Report (EPA) for Alumax 1/10/83. [39]

Generator: Alumax  
Facility (where shipped to): Chem. Security Systems  
Transporter: Great Western Chemicals Company  
Gresham Transfer HWT 9.

Wastes listed include 1,1,1 trichloroethane and methylchloroform (methylene chloride).

3. Series of invoices showing sale of 1,1,1 trichloroethane to Travis Pattern & Foundry by Great Western Chemicals in 1977. [136-143]
4. A summary of Great Western Chemicals' invoices compiled by Keith Halleland for Key Tronic indicates Great Western Chemical sold methylene chloride, 1,1,1 trichloroethane, and trichloroethylene to various businesses in the Spokane vicinity. [9]

#### B. Documentation that Great Western Chemicals was a "recycler" of contaminants of concern, includes the following:

1. Activity Report, July 17, 1987 - July 23, 1987, by Robert Bailor, Private Investigator for Key Tronic. Bailor spoke with Dean DeShane, attorney for Great Western Chemicals,



Portland (July 23, 1987). DeShane stated that on January 31, 1983, Great Western Chemicals received 4 drums of trichloroethylene or 1,1,1 trichloroethane (he wasn't sure of the pronunciation) from Travis Pattern & Foundry. [162]

2. Deposition of Jonas Stutzman (pg. 10-11) employee of Travis Pattern & Foundry, August 6, 1986. According to Stutzman, Travis sent trichloroethylene sludge to Washington Chemical or Great Western Chemicals for recycling. [146]
- C. Documentation that Great Western Chemicals disposed of contaminants of concern at Colbert Landfill: None.

## 2. Summary

There is sufficient evidence to support an assumption that Great Western Chemicals sold the contaminants of concern and operated as a recycler for 1,1,1 trichloroethane and methylene chloride. However, there is no evidence indicating Great Western Chemicals disposed of the contaminants of concern at Colbert Landfill. The information collected does not justify sending a 104 Notice Letter to the company.

## XIV. Washington Chemical

Washington Chemical can be classified as a transporter of hazardous waste and may fall under the scope of CERCLA Section 107(a)(4). The information collected suggests that Washington Chemical sold and recycled trichloroethylene.

### 1. Basis for Inclusion

- A. Documentation that Washington Chemical sold and recycled contaminants of concern includes the following:

1. Deposition of Jonas Stutzman, employee of Travis Pattern & Foundry (Aug. 6, 1986). Stutzman stated that Travis Pattern has/does purchase trichloroethylene from Washington Chemical. According to Stutzman, Travis sends/sent their trichloroethylene sludge back to Washington Chemical and/or Great Western Chemicals for recycling. [146]

- B. and C. Documentation that Washington Chemical disposed of contaminants of concern at Colbert Landfill: None.

### 2. Summary

The information indicates only that Washington Chemical sold and transported the contaminants of concern. There is no documentation that Washington Chemical disposed of the contaminants of concern nor any other waste at Colbert Landfill. The information collected does not justify sending a 104 Notice Letter to the company.



XV. Union Pacific Railroad

1. The only documentation found during the preliminary investigation which implicated Union Pacific Railroad is the list of Landfill Charge customers for Colbert Landfill. Union Pacific Railroad was included in the list for customers in September 1976, May 1979, December 1979, and February 1980. [8]

No information was found that suggests Union Pacific Railroad used the contaminants of concern or disposed of such at Colbert Landfill.

2. Summary

The information collected does not justify sending a 104 Notice Letter to Union Pacific Railroad.



## SECTION 5.0 CONCLUSION

A total of ten parties have been identified as potentially responsible parties as a result of the preliminary investigation and analysis of the information collected.

The parties investigated were organized into three groups according to the documentation found:

- Group 1: Parties that disposed of contaminants of concern at Colbert Landfill.
- Group 2: Parties that used or transported contaminants of concern and disposed of waste (unspecified, or other than contaminants of concern) at Colbert Landfill.
- Group 3: Parties for which there is no evidence that they used Colbert Landfill as a disposal site, or no evidence that they used or transported contaminants of concern.

Those individuals and businesses which fell into group 1 or 2, were identified as "potentially responsible parties." These parties should be sent 104 Notice Letters. In addition, William Schmidt, former operator of Colbert Landfill should be sent a 104 Notice Letter as he managed the landfill during a period of time hazardous waste was dumped.

It should be noted that since the landfill records were incomplete, the amount of waste disposed of by the various parties was not a criteria in developing the list of potentially responsible parties.

- Group I                      Potentially Responsible Parties
- U.S. Air Force - Fairchild Air Force Base  
A & M Manufacturing  
Alumax Irrigation Products  
William Schmidt
- Group II                     Potentially Responsible Parties
- United Paint and Coatings  
Gene's Septic Service  
Husky Oil  
Williams Trucking  
Scollard's Dry Cleaning  
Van Waters and Rogers
- Group III                    Not identified as Potentially Responsible Parties
- Travis Pattern & Foundry  
Columbia Lighting  
Great Western Chemicals  
Washington Chemical  
Union Pacific Railroad



## **SECTION 6.0 RECOMMENDATIONS**

Jacobs Engineering Group makes the following recommendations for obtaining information regarding potentially responsible parties for the contamination at Colbert Landfill:

1. EPA should issue letters to the ten potentially responsible parties identified in this report, requesting information pursuant to Section 104(e) of the Comprehensive Environmental Responses, Compensation and Liability Act (CERCLA). Response to these letters should contain detailed information on how the hazardous waste generated or transported by the company was disposed of.
2. EPA should follow up on the information provided by Rhys Sterling, Spokane County Health District, regarding the disposal of drums by an engine repair shop located near Colbert Landfill.
3. EPA should develop financial information on each of the potentially responsible parties identified in this report to determine if the party is able to contribute to the cost of remedial activities at the Colbert Landfill.



## Appendix A

### REFERENCES

1. Environmental Protection Agency Work Plan: Colbert Landfill Site, for development of the Plan of Study, EPA Region X. 1980. 6 pages.
2. Golder Associates. 1986. Draft Remedial Investigation Report for the Colbert Landfill. Spokane, Washington. Prepared for State of Washington, Department of Ecology, (excerpts, "Summary of Interim Remedial Alternatives Selection."). 5 pages.
3. George Maddox and Associates, Incorporated. 1981. A Preliminary Report on the Geohydrology of the Colbert Landfill, Spokane County, Washington - Phase I. Prepared for Spokane County Utilities Department, Spokane, Washington, pages 6-8.
4. Ecology, Washington State Department. 1984. Focused Feasibility Study for Initial Remedial Measure at Colbert Landfill. Prepared by C. R. Thompson, Hazardous Waste Remedial Action Section, Remedial Action Division, Olympia, Washington, 26 pp. (pages 2-7).
5. Deposition of William Schmidt, July 31, 1986 (Armon vs. Key Tronic Corporation) (excerpts only). 19 pages.
6. Deposition of Florence Schmidt, July 31, 1986 (Armon vs. Key Tronic Corporation) (excerpts only). 4 pages.
7. Dump receipts from Colbert Landfill, 1978 - 1980. 9 pgs.

#2105	Air Force	10/30/78
#2175	United States Air Force	10/30/78
#3202	(Air Force)	1/19/79
#3509	U.S. Air Force	9/28/79
#9028	Gene's Septic	7/14/80
#9122	Gene's Septic	9/11/80
#9174	U.S. Air Force	6/13/80
#9179	Fairchild AFB 92CES R&G	10/10/80
#9193	John Barrows, Fairchild AFB	6/27/80
8. List of Landfill Charge Customers, Colbert Landfill, Aug. 22, 1969 - Aug. 1980. 18 pages.
9. Letter to Keith Halleland of Popham, Hauk, Schnobrich, Kaufman & Doty, Ltd. from Stanley Kempner of Goss, Moe, & Sampson, re: results of search of Great Western Chemicals' invoices, Aug. 13, 1986. Attached list of Great Western Chemicals' customers. 8 pages.
10. List of Chemicals suppliers and customers, (1976 - 81). Record search for Key Tronic, published by Time Mirror Press, March 20, 1980. 8 pages.
11. Chem Central Corporation Sales of Subject Chemicals in Quantities of Over 400 Gallons per year, (from files of Key Tronic), list provided by Chem Central Corporate Counsel. Information from year end summaries of sales. 3/16/87. 4 pages.



12. List of chemicals used and disposal methods, 92nd WPNS Maintenance and Storage Branch, Fairchild Air Force Base, June 14, 1973. 1 page.
13. Hazardous Waste Generator and Disposal, Fairchild Air Force Base, June 9, 1975. 1 page.
14. Memo, to USAFH/SGPM, Fairchild AFB re: Base Regulation 19-1 Para 1d(9); Chemicals Inventory Listing, no date; attached 92D FMS Chemicals Inventory. 2 pages.
15. Memo, to USAFH/SGPM, Fairchild AFB, from FFA (Capt. Larson/5263), Fairchild AFB, re: Chemicals Inventory Listing, 1/26/78. 1 page.
16. Memo to USAFH/SGPM, Fairchild AFB, from 92 MMS/MAWS, Fairchild AFB, re: Industrial waste, 1/27/78; attached Table VI-2, Estimate of Hazardous Waste from State and Federal Agencies. 2 pages.
17. Letter to: Mr. Legat, Spokane County Engineers' Office from Darlene G. Pierce, Contracting Officer, Fairchild AFB, re: Purchase Order F45613 78 MI2738, Disposal of Chemicals Wastes, 5/23/78; attached purchase order to Spokane County Engineers Office for Non-Personal Service, to cover the cost of dumping fees for disposal of chemical wastes. 3 pages.
18. Letter to Gary Jespersen, Fairchild AFB from James Legat, Utilities Engineer, Spokane County, Office of County Engineer, re: Landfill Charge Account. 6/7/78. 1 page.
19. Memo for the Record, Major Users of Industrial Solvents, Fairchild AFB, 10/79. 1 page.
20. Handwritten chart re Chemicals Inventory, Fairchild AFB, showing agent/process; code type; quantity; disposal method. No date. 4 pages.
21. Annual Chemical Products List: 92D Field Maintenance Squadron - Egress Shop, Fairchild AFB, 1/30/80. 1 page.
22. Letter to John Anicetti, Spokane County Health District from Damon Taam, Spokane County Office of County Utilities, re: Hazardous Waste Survey. 6/4/80. 2 pages.
23. Memo to 92 CES/DEEVE (Mr. Jespersen), Fairchild AFB from MAAMD (TSgt. Saul), Fairchild AFB, re: Hazardous Waste Management, 6/23/80; attached inventory of Chemicals waste list. 2 pages.
24. Memo to Base Environmental Coordinator, Fairchild AFB, from LGSP, Fairchild AFB, re: Health Hazard Items, 6/25/80; attached health hazard inventory list. 3 pages.
25. U.S. EPA. Notification of Hazardous Waste Activity form, Fairchild Air Force Base, 7/24/80. 2 pages.
26. U.S. EPA. Notification of Hazardous Waste Activity form, Fairchild Air Force Base, 7/17/80. 2 pages.



27. Purchase order form, from Base Contracting Division, Fairchild AFB to Spokane County Engineers Office, for Non Personal services to cover cost of dumping fees, 7/28/80. 2 pages.
28. Memo to EPA Region X from James W. Taylor, Colonel, USAF, Commander, re: Application for Hazardous Waste Permit, 11/18/80; attached U.S. EPA Hazardous Waste Permit Application form, Fairchild AFB, no date. 4 pages.
29. Shipping form to: DPDP Lewis OSB Spokane, Fairchild AFB from 92 CSG/AMS/244AR, Fairchild AFB, re shipping of trichloroethylene, 9/1/81. 1 page.
30. Memo to 92CSG/DEEV, Fairchild AFB, from 92 MMS/MAWS Fairchild AFB, re: Hazardous Waste Review, 6/10/82; attached Hazardous Waste Inventory; attached handwritten notes re waste from various divisions; attached List of chemical substances from Base Training Section; attached memo to Jim Pankanin, U.S. EPA Region X, from Benjamin Schneider, Colonel, USAF, Commander, re Amendment of 1981/82 Hazardous Waste Generator's Report, 11/9/84. 6 pages.
31. Letter to Colonel B.S. Schneider, Base Commander, Fairchild AFB from James Malm, WDOE, re: hazardous waste compliance inspection, 10/17/83. 4 pages.
32. 1981 Status Sheet for Non-Regulated Generators, Fairchild AFB, dated Feb. 23, 1983; attached WDOE Generator Annual Dangerous Waste Report form, Fairchild AFB, dated 4/18/23. 2 pages.
33. Table: Hazardous/Toxic Materials, 92 AMS Fire Control, Fairchild AFB, 4/11/83. 1 page.
34. Deposition of Russell Parish (Armon vs. Key Tronic Corporation, Superior Court, State of Washington, County of Spokane) August 1, 1986. 46 pages.
35. Statement of Joseph J. Floyd, June 4, 1987, taken by Robert G. Bailor, Investigator. 12 pages.
36. Letter to Ms. Terese Neu Richmond, Assistant Attorney General of Washington, from Gregory T. Costello, Perkins Coie, re: A & M Manufacturing Inc., July 6, 1987; attached Hazardous Waste, 1983 Annual Report of Washington Department of Ecology; attached EPA/State/Hazardous/Dangerous Waste Notifiers List dated 3/27/86. 7 pages.
37. Letter to Stanley Kempner, Goss, Moe & Sampson, from Janet Smith, NL Industries, re: Relationship between A & M Manufacturing and NL Industries, Sept. 11, 1986; attached chart describing the Rucker Company divestitures since 1961; attached list of corporate names and registered agents for A & M Manufacturing, Alumax and Travis, 6/22/87. 3 pages.
38. Letter to William Ellis, Alumax Irrigation Products from Douglas Dunster, WDOE, re: Dangerous Waste Compliance Inspection, Aug. 26, 1983; attached RCRA/WAC 173-303 Dangerous Waste, Compliance Checklist/Questionnaire for Alumax Irrigation Products, dated Aug. 24, 1983. 10 pages.
39. EPA form: Generator Annual Hazardous Waste Report, Alumax Irrigation Products, dated 1/10/83. 3 pages.



40. Form: Generator Annual Dangerous Waste Report for 1983, Alumax Irrigation Products, dated 1/31/84. 2 pages.
41. Form: Notification of Dangerous Waste Activities, Alumax Irrigation Products, dated 2/26/86. 3 pages.
42. Plaintiff's First Set of Interrogatories to Defendant Alumax, Inc. and Alumax Fabricated Products, Inc.'s Responses Thereto, Key Tronic vs. Columbia Lighting, Inc. (Superior Court of Washington for Spokane County), July 16, 1987. 20 pages.
43. Invoice from Great Western Chemicals for sale of Chemicals to Alumax Irrigation Product. No. 05 20706, 5/27/76. 1 page.
44. Invoice from Great Western Chemicals for sale of Chemicals to Alumax Irrigation Products. No. 08 15651, 8/25/78. 1 page.
45. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. 1016514, 10/10/78. 1 page.
46. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. 1012014, 1/5/79. 1 page.
47. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. 0419550, 3/30/79. 1 page.
48. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. 0610932, 6/15/79. 1 page.
49. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. 0912461, 9/14/79. 1 page.
50. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. 14719, 1/22/80. 1 page.
51. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. 15137, 2/15/80. 1 page.
52. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. 15484, 3/7/80. 1 page.
53. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. 15528, 3/11/80. 1 page.
54. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. 0315662, 3/18/80. 1 page.
55. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. 0415974, 4/4/80. 1 page.
56. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. 0516524, 5/13/80. 1 page.
57. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. 0817915, 8/19/80. 1 page.



58. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. G45051, 10/3/80. 1 page.
59. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. G45613, 11/11/80. 1 page.
60. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. G46141, 1/6/81. 1 page.
61. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. G46529, 1/30/81. 1 page.
62. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. G46854, 2/24/81. 1 page.
63. Invoice from Great Western Chemicals Company for sale of Chemicals to Alumax Irrigation Products. No. G47190, 3/20/81. 1 page.
64. Invoice from Great Western Chemicals for sale of Chemicals to Alumax Irrigation Products, No. G46739, 2/12/81; attached invoice No. G46739 copy; attached purchase order from Alumax to Great Western Chemicals. No. 3308. 3 pages.
65. Invoice from Great Western Chemicals for sale of Chemicals to Alumax Irrigation Products, No. 46842, 2/23/81; attached copy of invoice; attached purchase order from Alumax to Great Western Chemicals, No. 3275. 3 pages.
66. Invoice from Great Western Chemicals for sale of Chemicals to Alumax Irrigation Products, No. 46854, 2/24/81; attached copy of invoice; attached purchase order from Alumax to Great Western Chemicals, No. 3275. 3 pages.
67. Invoice from Great Western Chemicals for sale of Chemicals to Alumax Irrigation Products, No. G90118, 2/27/81; attached copy of invoices. 2 pages.
68. Copy of check from Alumax, payable to Great Western Chemicals, 2/3/81; attached invoice from Great Western Chemicals, No. G46141, 1/6/81; attached copy of invoice; attached purchase order from Alumax to Great Western Chemicals, No. 3147; attached invoice from Great Western Chemicals, No. G45991, 12/19/80; attached copy of invoice; attached purchase order from Alumax to Great Western Chemicals, No. 2701, 11/20/80; attached credit memo from Great Western Chemicals to Alumax, No. G90065, 1/7/81; attached copy of credit memo. 9 pages.
69. Copy of check from Alumax payable to Great Western Chemicals, 3/6/81; attached credit memo from Great Western Chemicals to Alumax, No. G90063, 1/30/81; attached copy of credit memo. 3 pages.
70. Copy of check from Alumax payable to Great Western Chemicals, 4/2/81; attached invoice from Great Western Chemicals to Alumax, No. G46529, 1/30/81; attached copy of invoice; attached copy of purchase order from Alumax to Great Western Chemicals, No. 2955, 1/28/81. 4 pages.



71. Copy of check from Alumax payable to Great Western Chemicals, 5/1/81; attached invoice from Great Western Chemicals, No. G47190, 3/20/81; attached copy of invoice; attached purchase order from Alumax to Great Western Chemicals, No. 3493, 3/19/81; attached credit memo from Great Western Chemicals to Alumax, No. G90141; attached copy of credit memo. 6 pages.

72. Copy of check from Alumax payable to Great Western Chemicals for sale to Alumax, No. G47519, 4/17/81; attached copy of invoice; attached purchase order from Alumax to Great Western Chemicals, No. 3709, 4/14/81; attached invoice from Great Western Chemicals for sale to Alumax, No. G47369, 4/7/81; attached copy of same invoice; attached purchase order from Alumax to Great Western Chemicals, No. 3621, 4/1/81; attached invoice from Great Western Chemicals for sale to Alumax, No. G47352, 4/3/81; attached copy of same invoice; purchase order from Alumax to Great Western Chemicals, No. 3626, 4/3/81; purchase order from Alumax to Great Western Chemicals, No. 3621, 4/1/81; attached credit memo from Great Western Chemicals to Alumax, No. G90202; attached copy of same credit memo; attached credit memo from Great Western Chemicals Company to Alumax, No. G90182; attached copy of same credit memo; invoice from Great Western Chemicals for sale to Alumax, No. G47458, 4/10/81; attached copy of same invoice; attached purchase order from Alumax to Great Western Chemicals, No. 3674, 4/9/81. 18 pages.

73. Check from Alumax payable to Great Western Chemicals, 6/24/81; attached invoice from Great Western Chemicals for sale to Alumax, No. G47977, 5/14/81; attached purchase order from Alumax to Great Western Chemicals, No. 3764, 4/27/81; invoice from Great Western Chemicals for sale to Alumax, No. G48000, 5/26/81; attached purchase order from Alumax to Great Western Chemicals, No. 3894, 5/22/81. 5 pages.

74. Check from Alumax payable to Great Western Chemicals, 7/24/81; attached credit memo from Great Western Chemicals to Alumax, No. G90312, 6/12/81; attached invoice from Great Western Chemicals for sale to Alumax, No. G48503, 6/30/81; attached purchase order to Great Western Chemicals, No. 2816, 6/29/81; attached invoice from Great Western Chemicals for sale to Alumax, No. G48429, 6/26/81; attached purchase order from Alumax to Great Western Chemicals, No. 4161, 6/25/81; attached invoice from Great Western Chemicals for sale to Alumax, No. G48230, 6/12/81; attached invoice from Consolidated Freightways for shipment to Alumax, 6/4/81; attached purchase order from Alumax to Great Western Chemicals, No. 4094, 6/11/81. 9 pages.

75. Check from Alumax payable to Great Western Chemicals, 2/9/82; attached credit memo from Great Western Chemicals to Alumax, No. G90618, 1/1/82; attached invoice from Great Western Chemicals Company for sale to Alumax, No. G50559, 1/8/82; attached purchase order from Alumax to Great Western Chemicals, 1/5/82. 4 pages.

76. Check from Alumax payable to Great Western Chemicals, 3/4/82; attached invoice from Great Western Chemicals for sale to Alumax, No. G50887, 2/2/82; attached purchase order from Alumax to Great Western Chemicals, No. 5045, 1/29/82; attached credit memo from Great Western Chemicals to Alumax, No. G90659, 2/2/82; attached purchase order from Alumax to Great Western Chemicals, No. 4870, 1/18/82. 6 pages.

77. Check from Alumax payable to Great Western Chemicals, 4/1/82; attached credit memo from Great Western Chemicals to Alumax, No. G90680, 2/26/82; attached credit memo from Great Western Chemicals No. G90880, 2/26/82; attached invoice from Great Western Chemicals for sale to Alumax, No. G51163, 2/26/82; attached purchase order from Alumax to Great Western Chemicals, No. 5193, 2/25/82. 5 pages.



78. Check from Alumax payable to Great Western Chemicals, 5/24/82; attached invoice from Great Western Chemicals for sale to Alumax, No. G51709, 4/16/82; attached purchase order from Alumax to Great Western Chemicals, No. 5524, 4/15/82; attached invoice from Great Western Chemicals for sale to Alumax, No. G51729, 4/20/82; attached credit memo from Great Western Chemicals to Alumax, No. G90682, 4/16/82. 5 pages.
79. Check from Alumax payable to Great Western Chemicals, 9/20/82; attached credit memo from Great Western Chemicals to Alumax, No. G90883, 8/20/82; attached invoice from Great Western Chemicals for sale to Alumax, No. G53182, 8/20/82; attached invoice from Great Western Chemicals for sale to Alumax, No. G52912, 7/30/82; attached purchase order from Alumax to Great Western Chemicals, No. 6029, 7/27/82. 6 pages.
80. Check from Alumax payable to Great Western Chemicals, 11/23/82; attached invoice from Great Western Chemicals for sale to Alumax, No. G53722, 10/12/82; attached purchase order from Alumax to Great Western Chemicals, No. 6486, 10/8/82. 3 pages.
81. Check from Alumax payable to Great Western Chemicals 12/12/82; attached invoice from Great Western Chemicals for sale to Alumax (recycling of hazardous waste service) No. G54135, 11/18/82. 2 pages.
82. Invoice from Great Western Chemicals for sale to Alumax, No. G54193, 11/19/82; attached purchase order from Alumax to Great Western Chemicals, No. 6553, 11/19/82. 3 pages.
83. Check from Alumax payable to Great Western Chemicals, 1/13/84; attached invoice from Great Western Chemicals for sale to Alumax, No. 2059306, 12/19/83; attached purchase order from Alumax to Great Western Chemicals, No. 6213, 2/9/83. 3 pages.
84. Check from Alumax payable to Great Western Chemicals 2/10/84; attached invoice from Great Western Chemicals for sale to Alumax, No. 2059629, 1/9/84; attached receipt showing sale to Alumax by Great Western Chemicals, No. 66830, 1/10/84; attached purchase order from Alumax to Great Western Chemicals, No. 6258, 1/10/84. 4 pages.
85. Check from Alumax payable to Great Western Chemicals, 3/5/84; attached credit memo from Great Western Chemicals to Alumax, No. G91458, 2/2/84; attached invoice from Great Western Chemicals Company for sale to Alumax, No. 2059850, 2/2/84; attached purchase order from Alumax to Great Western Chemicals, No. 8602, 2/2/84. 4 pages.
86. Check from Alumax payable to Great Western Chemicals, 3/14/84; attached invoice from Great Western Chemicals for sale to Alumax, No. 2060086, 2/16/84; attached receipt showing sale to Alumax from Great Western Chemicals, No. 67075, 2/17/84. 3 pages.
87. Check from Alumax payable to Great Western Chemicals, 4/18/84; attached invoice from Great Western Chemicals for sale to Alumax, No. 2060431, 3/12/84; attached receipt showing sale to Alumax by Great Western Chemicals, No. 66850, 3/13/84; attached invoice from Great Western Chemicals for sale to Alumax, No. 2060431, 3/12/84; attached purchase order from Alumax to Great Western Chemicals, No. 8672, 3/12/84; attached invoice from Great Western Chemicals for sale to Alumax, No. 2060432, 3/12/84. 6 pages.
88. Notice of Completion of Public Works Contract, to Audit Section, Dept. of Revenue from Robert Turner, Spokane County, 10/19/77. 1 page.
89. Septic Pumpers Record Form, Spokane County Health District, for Gene's Septic Service, 9/1980. 1 page.



90. Purchase order from United Paint & Coatings to Chem-Securities Systems (for disposal of hazardous waste), No. 51235, 9/24/81. 1 page.
91. Invoice from Van Waters and Rogers for sale to United Coatings, No. 03-07-00629, 7/30/81. 1 page.
92. Invoice from Van Waters and Rogers for sale to United Coatings, No. 03-07-01262, 7/31/82. 1 page.
93. Invoice from Van Waters and Rogers for sale to United Coatings, No. 03-09-00488, 9/22/81. 1 page.
94. Invoice from Van Waters and Rogers for sale to United Coatings, No. 01-09-00584, 9/23/81. 1 page.
95. Invoice from Van Waters and Rogers for sale to United Coatings, No. 03-08-00553, 9/22/81. 1 page.
96. Invoice from Van Waters and Rogers for sale to United Coatings, No. 03-09-00865, 9/28/81. 1 page.
97. Invoice from Van Waters and Rogers for sale to United Coatings, No. 03-09-00878, 9/25/81. 1 page.
98. Invoice from Van Waters and Rogers for sale to United Coatings, No. 03-08-00006, 8/20/81. 1 page.
99. Invoice from Van Waters and Rogers for sale to United Coatings, No. 03-08-00963, 8/31/81. 1 page.
100. Invoice from Van Waters and Rogers for sale to United Coatings, No. 03-08-00308, 8/20/81. 1 page.
101. Invoice from Van Waters and Rogers for sale to United Coatings, No. 03-10-0037, 10/20/81. 1 page.
102. Invoice from Van Waters and Rogers for sale to United Coatings, No. 03-02-00215, 12/28/81. 1 page.
103. Credit memo from Van Water and Rogers to United Coatings, No. 03-10741, 8/3/81. 1 page.
104. Credit memo from Van Water and Rogers to United Coatings, No. 03-10404, 8/31/81. 1 page.
105. Credit memo from Van Water and Rogers to United Coatings, No. 03-10465, 9/16/81. 1 page.
106. Credit memo from Van Water and Rogers to United Coatings, No. 03-13300, 10/7/81. 1 page.
107. Credit memo from Van Water and Rogers to United Coatings, No. 03-1201, 1/13/82. 1 page.



108. Credit memo from Van Water and Rogers to United Coatings, No. 03-1371, 1/13/82. 1 page.
109. Waste Management, Inc. Generator Waste Material Profile Sheet for United Coatings, 5/28/82. 1 page.
110. Invoice from Chem-Security Systems, Inc. for sale to United Coatings (for disposal of hazardous waste), No. 34345, 9/30/82. 1 page.
111. Memo to Wm. Radobenko from Carol Silva, re: History of Previous Practices of Hazardous Waste Disposal by United Paint, 1/14/1986 or 1987(?). 2 pages.
112. Spokane County Utilities Department, listing of account numbers and names for disposal at Colbert Landfill, 10/8/80. 1 page.
113. Spokane County Utilities Department, listing of account numbers and names for disposal at Colbert Landfill, 4/17/81. 1 page.
114. Spokane County Utilities Department, listing of account numbers and names for disposal at Colbert Landfill, 2/6/82. 1 page.
115. Spokane County Utilities Department, listing of account numbers and names for disposal at Colbert Landfill, 10/7/82. 1 page.
116. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-03-00210, 3/11/81. 1 page.
117. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-03-00650, 3/20/81. 1 page.
118. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-03-01117, 3/31/81. 1 page.
119. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-04-00022, 4/7/81. 1 page.
120. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-04-01101, 4/29/81. 1 page.
121. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-05-00011, 5/12/81. 1 page.
122. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-05-00514, 5/26/81. 1 page.
123. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-05-01178, 6/9/81. 1 page.
124. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-06-00444, 6/18/81. 1 page.
125. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-06-00863, 6/30/81. 1 page.



126. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-07-00265, 7/20/81. 1 page.
127. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-07-00888, 7/28/81. 1 page.
128. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-08-00399, 8/25/81. 1 page.
129. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-08-00348, 8/31/81. 1 page.
130. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-09-00524, 9/15/81. 1 page.
131. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-09-00340, 9/15/81. 1 page.
132. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-09-01190, 10/2/81. 1 page.
133. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-09-01209, 10/2/81. 1 page.
134. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-10-00802, 10/22/81. 1 page.
135. Invoice from Van Water & Rogers for sale to Scollard's Drive-In Cleaners, No. 03-01-00024, 1/12/82. 1 page.
136. Invoice from Great Western Chemicals for sale to Travis Pattern Works, No. (?), 2/7/77. 1 page.
137. Invoice from Great Western Chemicals for sale to Travis Pattern Works, No. (?), 2/10/77. 1 page.
138. Invoice from Great Western Chemicals for sale to Travis Pattern Works, No. (?), 2/15/77. 1 page.
139. Invoice from Great Western Chemicals for sale to Travis Pattern Works, No. (?), 5/19/77. 1 page.
140. Invoice from Great Western Chemicals for sale to Travis Pattern Works, No. 0627593, 6/6/77. 1 page.
141. Invoice from Great Western Chemicals for sale to Travis Pattern Works, No. 1030115, 10/10/77. 1 page.
142. Invoice from Great Western Chemicals for sale to Travis Pattern Works, No. 1130839, 11/21/77. 1 page.
143. G. W. Solvent #5050, description of solvent contents, Great Western Chemicals. 1977.



144. Agreement for Sale and Purchase of Property, between Alumax Irrigation Products (vender) and Travis Pattern & Foundry, Inc., 4/30/84; attached Resolution re: Agreement for Sale and Purchase of Property, Board of Directors of Travis Pattern & Foundry, signed by Jeanette A. Fletcher, Secretary, 4/23/84; attached Resolution re: Agreement for Sale and Purchase of Property, (for purposes of Old National Bank of Washington), signed by Jeanette A. Fletcher, Secretary, 4/23/84; attached Special Meeting of Board of Directors of Travis Pattern & Foundry, Inc., 4/23/84; attached Waiver of Notice of Special Meeting of Board of Directors of Travis Pattern & Foundry, Inc., 4/23/84. 15 pages.

145. Affidavit of Jonas Stutzman (Key Tronic Corporation vs. Columbia Lighting, Superior Court of Washington for Spokane County), 5/5/87. 3 pages.

146. Deposition of Jonas Stutzman (Armon vs. Key Tronic Corporation, Superior Court, State of Washington, County of Spokane), 8/6/86. (Excerpts only). 9 pages.

147. Plaintiff's Answer to Defendants' First Set of Interrogatories, (Key Tronic Corporation vs. Columbia Lighting), to Travis Pattern & Foundry, 3/2/87. 4 pages.

148. Letter to Carl Neuchterlein, WDOE, from Jack Leonard, Columbia Lighting, Inc., re: Paint Sludge, 7/21/81. 1 page.

149. Letter to Jack Leonard, Columbia Lighting, Inc., from James Malm, WDOE, re: request for local disposal of paint sludge, 12/14/81. 1 page.

150. Letter to Damon Taam, County Utilities Engineer, from John Anicetti, Spokane County Health District, re: Disposal of Columbia Lighting Paint Sludges, 12/15/81. 1 page.

151. Letter to Damon Taam, Spokane County Utilities, from Jack Leonard, Columbia Lighting Inc., re: permission to dispose of paint sludge in local landfill, 12/16/81. 1 page.

152. Letter to Damon Taam, Spokane County Utilities, from Jack Leonard, Columbia Lighting, Inc., re: test results on paint sludge, 2/2/82. 1 page.

153. Memo to Columbia Lighting, Inc., from Laucks Testing Laboratories, Inc., re: Test on paint sludge, results, 6/25/81. 1 page.

154. Letter to Columbia Lighting from Linda Baker, Bio Med Research Laboratories, Inc., 11/23/81, re: Acute toxicity bioassay tests performed on juvenile rainbow trout, 11/30/81. 1 page.

155. Data Sheet for Static Basic Acute Fish Toxicity Test, for Columbia Lighting, by Bio Med Research, 11/28/81.. 1 page.

156. Letter to Jerry Neal, Lukins & Annis, P.S. from Damon Taam, Spokane County Utilities, re: Dumping of 1,1,1 trichloroethane by Columbia Lighting, 8/23/83. 1 page.

157. Activity Report, Robert Bailor, private investigator for Key Tronic Corporation, May 27, 1987 (interview with Robert W. Schell). 2 pages.



158. Activity Report, Robert Bailor, private investigator for Key Tronic Corporation, May 29 to June 4, 1987; attached Laboratory Analysis Results, to City of Spokane from ABC Laboratories, Inc. (sample from Cowles Publishing Company, Spokane), 11/5/83; attached letter to Mr. Roberts, Cowles Publishing from Tom Pelton, City of Spokane re: water sample analysis results, no date; attached Newspaper Article, "Newspaper's Yellow Ink Is Being Tested for PCBs," Dick Mody, 3/27/84; attached Pretreatment Industrial List. 13 pages.
159. Activity Report, Robert Bailor, private investigator for Key Tronic Corp., June 5 to June 11, 1987. 8 pages.
160. Activity Report, Robert Bailor, private investigator for Key Tronic Corp., July 3 to July 9, 1987. 6 pages.
161. Activity Report. Robert Bailor, private investigator for Key Tronic Corp., July 7 to July 16, 1987. 3 pages.
162. Activity Report. Robert Bailor, private investigator for Key Tronic Corp., July 17 to July 23, 1987. 2 pages.
163. Activity Report, Robert Bailor, private investigator for Key Tronic Corp., May 21 to 28, 1987; attached lists of self-service cleaners, septic tank cleaners and garbage collectors.
164. Activity Report, Robert Bailor, private investigator for Key Tronic Corp., re: corporate history for A & M/Alumax, 6/8/87. 2 pages.
165. Colbert Fact Sheet, listing (1) known purchases by PRPs, quantities and chemicals; (2) volume of chemicals known to be purchased from distributors by various companies; (3) total volume of chemicals known to be purchased by various companies., compiled by Key Tronic Corporation, 8/17/87. 4 pages.
166. Memo to File - Key Tronic from James Moore, Perkins Coie, re: Conversation with Jim Legat of Spokane County Utilities Department, July 23, 1987. 3 pages.
167. Generators Waste Material Profile Sheet form, Chem-Security Systems, 1/17/84, listing Alumax Cast Products as generator. 2 pages.
168. Letter to Great Western Chemicals from William Ellis, Alumax, requesting transport of hazardous wastes, 3/26/81; attached U.S. Dept. of Labor, material safety data sheet, manufacture listed as PPG Industries, Inc., 8/31/78. 3 pages.
169. Letter to Great Western Chemicals from William Ellis, Alumax, requesting authorization to dispose of spent trichloroethylene, 1/15/82. 1 page.
170. Chemicals Transport Manifest, Chem-Security Systems, generator listed as Alumax Irrigation Products. 5/5/81. 18 pages.
171. Environmental Review Worksheet, Alumax Irrigation Products, prepared by Amax Environmental Services, 6/8/83. 18 pages.



172. Hazardous Waste Manifest, to Van Waters & Rogers from Alumax Irrigation Products, generator, manifest document number 062984-01, 7/17/84; attached handwritten note from R. S. Horne suggesting that drums of 1,1,1 trichloroethane were mislabeled and contents were actually trichloroethylene. 2 pages.



## Appendix B

### INTERVIEW SUMMARIES

#### 1. Key Tronic

Personnel of Key Tronic were interviewed in order to ascertain the status of the firm's search for other responsible parties and to obtain useful information collected by Key Tronic. Individuals present at the meeting were Bruce Foreman, Vice President, Circuit Division, Key Tronic; David Powers, in-house counsel, Key Tronic; Jerry Neal, Lukins & Annis, P.S.C., representing Spokane County; Robert Bailor, Private Investigator hired by Key Tronic.

David Powers provided a brief description of the investigation conducted by Key Tronic. The investigation began approximately two years ago (1985) and the following steps have been taken:

- 1) All businesses in the Spokane area which were or are currently suppliers, purchasers, users or transporters of 1,1,1 trichloroethane were identified;
- 2) The files and records of the Spokane Utilities Department and other local agencies were reviewed. Key individuals were interviewed.
- 3) Chemical suppliers/distributors were requested to supply a list of customers purchasing 1,1,1 trichloroethane. (However, Key Tronic was not able to obtain this information from all of the suppliers.)
- 4) Depositions were taken of individuals with specific knowledge regarding the disposal of waste at Colbert Landfill, including Russell Parish, William Schmidt, Florence Schmidt, and Jonas Stutzman.
- 5) A private investigator, hired by Key Tronic, spoke with numerous individuals in the community and pursued various leads to new information.

Key Tronic's list of potentially responsible parties has been narrowed down to approximately ten companies and individuals.

Key Tronic and Spokane County have reached a dead end in their search for information. A request has been made of EPA to pursue the chemical suppliers/distributors in order to obtain a list of customers who purchased the relevant chemicals (tetrachloroethylene, 1,1,1 trichloroethane, trichloroethylene, methylene chloride). However, EPA Region X has made a distinction between the companies that supply the chemicals and companies that generate hazardous waste. In the search for potentially responsible parties, EPA has made a decision to follow the waste stream, not the product. Therefore, EPA will not request the chemical suppliers/distributors to provide a list of their customers.



2. Spokane County Public Works  
Dennis Scott, Director  
Jim Legat, Utilities Department

The director of Spokane County Public Works, Dennis Scott, was contacted for information regarding activities at Colbert Landfill. Mr. Scott identified Jim Legat of the Utilities Department, as the individual with the most extensive knowledge of Colbert Landfill.

Mr. Legat provided an explanation of the system used to collect payment from those disposing of waste at the landfill. Most transactions were on a cash basis, and a "generic ticket" was issued for the amount paid. Some customers maintained a charge account with the landfill.

The files and records of the Utilities Department were reviewed; however, little documentary evidence was found. Few records were kept of what was dumped at the landfill and by whom. Basically, only two sources provided relevant information: the list of monthly charge account customers (1969-1980) and the "dump receipt" books (for a period these were used instead of the "generic tickets"). However, even these sources did not provide a clear picture of who disposed of what at the Colbert Landfill.

The files also included correspondence and the diaries of the employees of Spokane County charged with the duty of monitoring the disposal of various wastes at Colbert Landfill.

3. Spokane County Health District  
Rhys Sterling, Solid Waste Program Coordinator

The files of the Spokane County Health District were reviewed for relevant documents. Rhys Sterling, Solid Waste Program Coordinator, provided what information he had regarding past activities at Colbert Landfill.

Mr. Sterling relayed a concern had by Ed Pickett, former Environmental Health Director, regarding an engine repair shop that operated near Colbert Landfill. Pickett remembers reports of drums of solvents, possibly degreasers, from this shop that were being disposed of. However, no other information has been found to help in identifying this enterprise.

The Health District's files contained little information relevant to the identification of responsible parties. Some useful correspondence was found. Also important were the Septic Pumpers Record Forms, which indicated where septic tank companies disposed of their wastes.



4. Washington Department of Ecology  
Eastern Regional Office, Spokane, Washington: Claude Sappington  
Headquarters, Olympia, Washington: Mike Blum

The files of both the regional office and headquarters for Washington Department of Ecology were reviewed. No new information was found at either WDOE office. The contact person at the regional office was Claude Sappington, WDOE, Spokane, Washington. The contact person at headquarters was Mike Blum, WDOE, Hazardous Waste Division, Olympia, Washington.

Neither Sappington nor Blum had personal knowledge regarding activities at Colbert Landfill that was relevant to the PRP search.

5. Spokane County Commissioner  
Commission John McBride, District I, Spokane County Commissioner

Commissioner McBride has been working with county agencies and Key Tronic on clean-up measures and related activities concerning Colbert Landfill.

Mr. McBride stated that he did not have any information other than what was available from agencies/individuals previously contacted by Jacobs personnel. He did suggest that the railroad companies (Great Northern, Burlington and Milwaukee Railroad Companies) be further investigated as potentially responsible parties.